
United States v. Sayoc
18 Cr 820 (JSR)
Defense Sentencing Submission Exhibits

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- B: Dr. Harrison G. Pope, Jr.'s Curriculum Vitae
- C: Expert Report by Dr. Michael B. First
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- E: Letter from Kimberly Sayoc (Mr. Sayoc's Cousin)
- F: Letter from Madeline Giardiello (Mr. Sayoc's Mother)
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- H: Letter from Dr. Eric Ciliberti (Mr. Sayoc's Childhood Friend)
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- J: North Miami Beach High School Transcript
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- L: Brevard Junior College Transcript
- M: Letter from Patricia Bonire (Mr. Sayoc's Aunt)
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- AA: Expert Report by Dale Mann of Engineering Systems Inc.
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EXHIBIT A



McLean HOSPITAL
HARVARD MEDICAL SCHOOL AFFILIATE



**HARVARD MEDICAL SCHOOL
TEACHING HOSPITAL**

HARRISON G. POPE, JR. M.D.

DIRECTOR
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PROFESSOR OF PSYCHIATRY

June 19, 2019

Attorney Sarah Baumgartel
Federal Defenders of New York, Inc.
10 Duane St., 10th floor
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Re: Cesar Sayoc

Dear Ms. Baumgartel,

At your request, I have examined your client, Cesar Sayoc, with particular attention to the question of whether his use of anabolic-androgenic steroids (hereafter "steroids") may have contributed to his acts of mailing potentially explosive devices to prominent political figures and related individuals in October 2018. In the following report, I present 1) my qualifications; 2) the materials that I have reviewed; 3) a summary of Mr. Sayoc's history; 4) a discussion of scientific knowledge regarding the psychiatric effects of steroids; and 5) my opinions regarding the role of steroids in Mr. Sayoc's criminal activity.

1. My qualifications:

I am a Professor of Psychiatry at Harvard Medical School, and Director of the Biological Psychiatry Laboratory at McLean Hospital in Belmont, MA, which is Harvard's principal psychiatric teaching hospital. I am the author of more than 330 peer-reviewed papers, 130 chapters and reviews, and 7 books on many areas of psychiatry. I also have more than 40 years of clinical experience in treating or consulting on several thousand patients with a wide range of psychiatric and substance-use disorders. The attached curriculum vitae provides a more detailed summary of my professional experience and qualifications.

For more than 30 years, I have been particularly interested in the use of anabolic steroids. This family of drugs comprises the natural hormone testosterone (which is nature's own anabolic steroid, so to speak), together with hundreds of synthetic derivatives of testosterone that have been created over the last 70 years. When steroids are taken in large doses, far beyond the normal levels of testosterone naturally produced in the body, they allow users to gain large amounts of muscle mass, often extending far beyond the degree of muscularity attainable by any natural individual who does not use steroids. About 98% of all steroid users are male.¹

From 1987 to the present, I have contributed more than 40 peer-reviewed papers advancing the understanding of different aspects of illicit steroid use and its effects, including 1) the first large study showing that steroids can cause major psychiatric effects,^{2, 3} which I subsequently replicated in a field study funded by the National Institutes of Health (NIH);⁴ 2) the

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first reports of “reverse anorexia nervosa,”⁵ or “muscle dysmorphia,”⁶ a form of body image disorder associated with steroid use;⁷⁻¹⁵ 3) the largest placebo-controlled laboratory study to date of psychiatric effects from high doses of steroids (also NIH-funded);¹⁶ 4) extensive work on the issue of steroid dependence syndromes;^{10-12, 17-19} and numerous other studies of the psychiatric and medical effects of steroids, the biology of steroids, and the epidemiology of steroid use,^{1, 20-48} including papers reporting violent or criminal behavior among individuals under the influence of steroids.⁴⁹⁻⁵¹

Collectively, my peer-reviewed articles involving steroids have acquired more than 3500 scientific citations – a number which is, to my knowledge, very much greater than the citation count for steroid research of any other researcher in the world. In addition to my peer-reviewed articles, I have written more than 30 invited reviews and book chapters about steroids, including the section on steroids for each of the last six successive editions of Sadock and Sadock’s *Comprehensive Textbook of Psychiatry*. I have also written a popular book, “*The Adonis Complex*,” that talks extensively about steroid use,⁵² now translated into six languages.

As a result of my work in this field, I have also served in several important public capacities. These included testimony regarding steroids before the United States Congress,⁵³ work on a committee advising the United States Government on sentencing guidelines for possession and distribution of steroids, membership on a Scientific Advisory Committee to the World Anti-Doping Agency, and service on the Technical Advisory Group to the CASA National Commission on Sports and Substance Abuse, among others. I have testified as an expert witness in numerous forensic cases involving steroids around the United States, both criminal and civil, and have published on these forensic issues as well.^{49, 51} I have also lectured both nationally and internationally on various aspects of steroids, including presentations in Japan, Korea, China, Australia, the United Kingdom, France, Norway, Sweden, and Denmark. In addition, I have frequently appeared in the lay media, both in the United States and abroad, to discuss aspects of steroid use.

I am currently working on a new five-year NIH-funded study looking at the potential neurological effects of steroids in weightlifters who have used steroids compared with weightlifters reporting no history of steroid use. In the course of this study and all of my preceding studies, I would estimate that I have evaluated more than 600 steroid users over the course of my career.

2. Materials reviewed:

In preparation for this report, I reviewed extensive records that you sent to me, including the Complaint against Mr. Sayoc filed by the FBI on October 26, 2018; the indictment of Mr. Sayoc by a grand jury on November 9, 2018; excerpts from Mr. Sayoc’s journal; approximately 500 photographs of Mr. Sayoc’s van and other items of evidence; FBI interviews of 15 witnesses associated with the case; a Collected Item Log reporting vials of stanozolol (a type of steroid) and cyanocobalamin (a vitamin), together with a wire stripper seized by the FBI; portions of Mr. Sayoc’s school records; items from his Twitter postings; excerpts from a government letter summarizing Mr. Sayoc’s criminal history; police records detailing Mr. Sayoc’s history of charges and court appearances, together with a summary of these materials prepared by your office; two case reports regarding complaints that Mr. Sayoc made to the Hollywood Florida Police Department; Facebook records of Mr. Sayoc’s activity; records from Miami-Dade County regarding a bomb threat made by Mr. Sayoc in 2002; materials related to threats that Mr. Sayoc made to the TMZ news organization; a bankruptcy petition filed by Mr. Sayoc in 2012; and a letter from Attorney Mermelstein involving a civil lawsuit that Mr. Sayoc brought

against Saint Stanislaus Boarding School for childhood sexual abuse when he was in sixth grade.

In addition to reviewing these materials, I interviewed Mr. Sayoc in person on March 8, 2019 at the Metropolitan Correctional Center in Manhattan where he is currently incarcerated. During this interview, which lasted two hours, I asked him systematically about his educational, social, occupational, and psychiatric history. In particular, I asked about his use of steroids over the course of his life and reviewed the effects that he had experienced when taking steroids, particularly in the fall of 2018 at the time of his recent reported offenses.

3. Mr. Sayoc's history

Mr. Sayoc grew up in North Miami Beach as the son of a Filipino father and an American mother. He was a good athlete and became an accomplished soccer player by the time of his high school years. He told me that his first use of steroids was the age of 15, when he first used methenolone (Anadrol), oxandrolone (Anavar), and fluoxymesterone (Halotestin) simultaneously. These three steroids are all available in pill form (unlike some steroids such as testosterone and nandrolone, which generally are used only by injection). The age of 15 is unusually early for starting steroid use; in fact, only about 0.5% of all steroid users in the United States have started to use these drugs by age 15. Mr. Sayoc may have started early because he was small, had a stuttering problem, was often bullied in school, and had few sources for self-esteem. In addition, judging from Attorney Mermelstein's letter, Mr. Sayoc as an 11-year-old child had been forced to endure almost nightly sexual abuse for an entire year from the man supervising his dormitory at Saint Stanislaus Boarding School – an experience that may well have contributed to his resolve to be bigger and stronger and never again be a victim.

Mr. Sayoc went on to college on a soccer scholarship, but ultimately was unable to complete college and returned to live with his grandparents in about 1984. In addition, partway into his college career, his father left the country and returned permanently to the Philippines. Mr. Sayoc told me that this left his mother with substantial debts. Probably because of his experience with other steroid users, Mr. Sayoc became aware of the male stripper/exotic dance industry and was financially quite successful in this business, going on tour around the country over the next 15 years. In my experience, this type of career is not uncommon among young steroid users who have discovered that they can make good money in the "club scene" if they continue to take steroids and stay in the best possible physical shape.

Judging from the government records that I reviewed, Mr. Sayoc was adjudicated without admitting guilt to two non-violent crimes during this era – one for theft of greater than \$300 in 1991, resulting in two years' probation, and the other for petty theft in 1992, resulting only in a fine.

Mr. Sayoc left the club scene to start a dry-cleaning business in about 2000 and was apparently initially successful at this activity. However, in 2002, while he was on a course of steroids (a combination of injected testosterone and nandrolone [Deca-Durabolin] together with methenolone and oxandrolone), he states that he became angry about his electric bill and "mouthed off" by making a bomb threat on the telephone to a woman at Florida Power & Light. This incident resulted in another year of probation.

Over the next 10 years, Mr. Sayoc returned to the club scene and continued to make a living there, occasionally doing well financially but ultimately becoming bankrupt in 2012, at which point he went to live with his mother. Midway through this interval, in about 2007, Mr.

Sayoc met Mario Grondin while working out in the gymnasium. On interview with the FBI, Mr. Grondin reported that he periodically supplied steroids to Mr. Sayoc from 2007 up to the present. Mr. Sayoc's account of this relationship concurs with Mr. Grondin's report to the FBI. Mr. Sayoc recalls that in earlier years it was possible for him to get pharmaceutical-grade steroids that had been diverted from the pharmaceutical industry. However, in more recent years, the steroids were typically compounded in underground laboratories and were sold simply as bottles of powder or liquids of unknown potency.

After 2012, Mr. Sayoc's financial status continued to be perilous. In 2013, as mentioned above, his attorney Mr. Mermelstein filed a demand letter with Saint Stanislaus School regarding the sexual abuse that Mr. Sayoc had reportedly endured as a sixth-grader. Although such cases often result in awards of hundreds of thousands or even millions of dollars, Mr. Sayoc told me that he received only \$6,000 for his case. He was unsure of the reasons that this outcome was so disappointing. In any event, he continued to live out of his van (as he had on and off for years), attempted to make money in the club scene, and was again apprehended for shoplifting in 2014, resulting in a fine. By 2016, he essentially gave up on the club scene and began delivering pizza for Papa John's, Domino's, and Pizza Hut. He reports that he was still taking steroids intermittently during the next couple of years. During this time, he had a series of incidents where he "mouthed off," or engaged in what he thought was "joking" behavior or "kidding around" that was not perceived so graciously by others – resulting in suspensions, transfers to less desirable positions, or outright loss of work.

In April 2018, according to Mario Grondin, Mr. Sayoc approached him and purchased \$1,650 worth of steroids, including injectable stanozolol (Winstrol) and testosterone. In the following months Mr. Sayoc may have also obtained additional steroids from other sources, because by the fall of 2018, he reports that he was taking testosterone, nandrolone, and stanozolol all by injection, together with oxymetholone and fluoxymesterone by mouth. He explained that this increase in his steroid use was due to the fact that he had secured a job as a bouncer at a gentlemen's club in West Palm Beach called Ultra – a fact confirmed in FBI interviews with other personnel from Ultra. Because of his job as a bouncer, Mr. Sayoc told me that he was eager to "bulk up" as much as possible. He added that "in gentlemen's clubs, size and image is everything." Consequently, he reported that he began taking all of these five steroids simultaneously and told me that he was gaining so much muscle that his bench press had almost reached 495 pounds. This is an impressive bench press for a man in his 50s, which would be almost impossible to achieve without using substantial doses of steroids.

On this high-dose regimen of steroids, Mr. Sayoc described that he felt "invincible." He believed that nothing could harm him and that he did not need to bow to anyone. In my experience, this is a common effect of large doses of steroids; over the years, I have heard 30 or 40 different men spontaneously choose the word "invincible" to try to characterize the psychological state that they experienced on these drugs. But along with the feelings of invincibility, Mr. Sayoc – a strong Trump supporter – experienced increasing irritability with what he perceived as the bias of the left-wing media. He became increasingly obsessed with the media's attitudes towards President Trump and covered his van with Trump stickers and posters. In July of 2017, he found that someone had broken the window of his van and stolen \$380 – and he became suspicious that the vandalism might have been caused by a leftist who resented his Trump stickers. He began sending text messages to Mario with political comments and links to political news articles at all hours of the day. Mario told the FBI that he became so annoyed with the constant texts, arriving even in the middle of the night, that he left Mr. Sayoc a voicemail telling him to stop sending texts and to contact him only if he wanted to buy more steroids.

Mr. Sayoc reported that his political obsessions became increasingly severe, to the point that he could think of little else. He resolved that he needed to do something to scare or deter the prominent figures in the media and on the left. Accordingly, he obtained fireworks, created crude devices that looked like pipe bombs, and mailed them to numerous prominent figures, including Barack Obama, Hillary Clinton, George Soros, Robert De Niro, and others. He explained to me that he recognized that these "pipe bombs" were merely "decoys," in that they had no triggering mechanism and were not actually designed to explode. He told me that at the time, it did not occur to him that there might be serious consequences to these actions because the steroids made him feel "invincible." In short, he appeared unable to recognize what his behavior looked like when viewed objectively from the outside. In a similar apparent lack of recognition, he sent a text to Mario with a link to the New York Times article regarding the bomb package sent to George Soros' house.

One or two nights later, he described to me watching the news on television and seeing an official come on the screen and state that the full resources of the Federal Bureau of Investigation and the United States Government would be devoted to apprehending the maker of the bombs, no matter what was required. In a moment of shock, he suddenly realized, perhaps for the first time, the severity of what he had done.

4. The psychiatric effects of steroids: current scientific knowledge

Can the use of steroids cause behavioral effects comparable to those reported by Mr. Sayoc? The short answer is yes; a substantial scientific literature over the last 30 years has abundantly documented that steroids can cause some men to develop severe psychological effects, most commonly characterized by irritability, aggressiveness, violence, and criminal behavior. This literature is summarized briefly below.

Field studies and epidemiologic studies: As early as the 1980s, anecdotal reports began to appear in the scientific literature suggesting that steroids could cause some individuals to develop "manic" or "hypomanic" syndromes, characterized by symptoms such as exaggerated self-confidence (sometimes rising even to the level of delusional beliefs of invincibility), together with hyperactivity, irritability, impaired judgment, aggression, violence, and even psychotic symptoms such as paranoid and grandiose delusions.^{54, 55} Reports also suggested that individuals could develop depression during the withdrawal phase after stopping steroids, with accompanying symptoms of depressed mood, fatigue, impairment of sleep and appetite, and sometimes suicidal feelings or actual suicide attempts.⁵⁶⁻⁵⁸ By the late 1980s, my research group had documented these same effects in a larger sample of steroid users,^{2, 3} and we subsequently demonstrated in a systematic controlled study that these psychiatric effects were significantly more common in steroid users than in otherwise similar weightlifters who had not used these drugs.⁴ In subsequent years, many additional field studies were published, describing comparable psychiatric effects in men using steroids. Epidemiologic studies also appeared in the scientific literature, linking steroid use with violent or criminal behavior (e.g.,⁵⁹⁻⁹²). I have summarized these studies in several review articles,^{19, 24, 34, 50, 93, 94} as have other authors.⁹⁵⁻⁹⁸ Importantly, it has been found that these effects are idiosyncratic, in that many steroid users experience few psychiatric effects, while a minority of users experience prominent effects with severe mood swings and personality changes.^{24, 99}

In particular, a number of the above studies have documented cases of violent or criminal behavior associated with steroid use. For example, several reports have described men with little or no history of violence or criminal behavior prior to steroid use who committed

murder or attempted murder while exposed to steroids.^{49, 51, 62, 64} Other reports did not involve cases of actual attempted murder, but described violence or criminal behavior on steroids that appeared entirely uncharacteristic of the individual's premorbid personality.^{68, 100, 101} In another report, an investigator in Australia commented on two violent murders in Sydney, Australia apparently associated with AAS use; this report prompted the suggestion that violent offenders be routinely tested for AAS.⁶⁷ A more recent review article⁹⁵ reports six cases of steroid-induced violence seen personally by the authors, including three homicides and three violent assaults. These men were described as exhibiting "stereotypic qualities of irritability, aggressiveness, and grandiosity." The authors report that all six men returned to a normal mental status within two months of stopping steroids.

Although it is not possible to prove that steroids played a causal role in every case above, it is clear that most of the individuals described did not display any comparable behaviors in the absence of steroid exposure – suggesting that steroids indeed were the primary causal factor. It is also notable that many of the cases exhibited stereotypic qualities of aggression or violence grossly disproportionate to the circumstances, often accompanied by an element of paranoia or grandiosity, again suggesting that these were not chance phenomena, but were attributable to an actual biological effect that the steroids had exerted on the brain.

Placebo-controlled laboratory studies: Despite the substantial weight of evidence from the studies above, one might still question whether the psychological effects observed might be attributable to factors other than steroids themselves. For example, one might argue that people who choose to take steroids may be more inherently aggressive or more prone to criminal activity than people who do not choose to take steroids, and that the behavior observed might reflect the underlying personality of the steroid user, rather than a biological effect of the steroids themselves. One might also argue that some of the effects observed were attributable to the power of suggestion. For example, people who take steroids might expect that they would become more dominant and aggressive, and consequently start to behave in that manner, simply as a result of these expectational effects. Similarly, one might argue that people who take steroids are generally exposed to the culture of the gym and other weightlifters, and that these influences, rather than the drugs themselves, are responsible for behavioral changes. How does one respond to these methodological critiques?

The definitive way to test these questions, both in the case of steroids and in the case of other types of drugs, is through a randomized, prospective, double-blind, placebo-controlled trial. In such a trial, volunteers are randomized to receive steroids or to receive an inert placebo under blinded conditions, where neither the study participant nor the study investigators are aware of the identity of the treatment that a given participant is receiving. If such a study shows a statistically significant difference between drug and placebo, then the effect is unlikely to be attributable to suggestive or expectational effects, since participants are not aware of whether they are receiving steroids or placebo at a given time.

There have now been four such studies in normal volunteers using doses of at least 500 milligrams mg per week of testosterone or equivalent steroids.^{16, 102-105} These combined studies evaluated 109 men at this dosage level; five (4.6%) of these men developed hypomanic or manic syndromes (i.e., prominent behavioral disturbances similar to those seen in the manic or hypomanic phase of bipolar disorder) during blinded steroid administration, whereas none showed such syndromes on placebo. In one of these studies, conducted at the National Institutes of Health,¹⁰³ one of the volunteers – a man with no prior psychiatric history – became so aggressive during blinded steroid administration that he was placed in a seclusion room. In another study, conducted in my laboratory,¹⁶ a previously asymptomatic man became so

aggressive that he frightened people at his job and needed to be withdrawn from the study for safety. When the blind was broken afterwards, he proved to have been receiving testosterone at the time.

In the course of the same study just described, my research group also administered a protocol called the Cherek Point Subtraction Aggression Paradigm to a subgroup of the study participants.¹⁰⁶ In this protocol, the participant plays a “game” on a computer against an unseen opponent. The participant can press a button to accumulate points exchangeable for money (the “non-aggressive” response) or press another button to subtract points from his opponent (the aggressive response). In fact, the unseen “opponent” is a computer program that deliberately subtracts points from the participant in order to provoke an aggressive response. In this protocol, participants displayed strikingly and significantly higher levels of aggression when they were receiving injections of testosterone as compared to when they were receiving injections of placebo – all under double-blind conditions.

Importantly, my study utilized a maximum of 600 milligrams of testosterone per week, because safety considerations prevented us from using higher doses. However, illicit steroid users in the field, such as Mr. Sayoc, commonly use doses of well over 1,000 milligrams of testosterone or equivalent per week, and sometimes as much as 5,000 milligrams per week. Thus, the 4.6% figure quoted above may substantially underestimate the true prevalence of such psychological syndromes among steroid users taking higher doses of these drugs in the real world.

In summary, there is clear scientific evidence that high doses of steroids can cause some individuals to develop profound personality and mood changes, and to display aggressiveness, violence, or criminal behavior that is entirely different from their normal personalities. Furthermore, it is now clear from the scientific evidence that this effect has a biological basis, and cannot be explained merely by psychological factors, underlying personality factors, or the power of suggestion. The weight of this accumulated evidence is such that one prominent research group has written that “... after considering the breadth of the anabolic steroid scientific literature, it would seem that the finding that AS [anabolic steroids] promote aggression meets the Daubert criteria.”⁸⁴ I concur entirely with the conclusions of this research group in this respect.

The stereotypic nature of steroid-induced psychological effects: Although the psychiatric effects of steroids are now firmly established scientifically, many people have never witnessed a case of steroid-induced aggression or criminal behavior, and therefore they often misunderstand what these effects are like. This misunderstanding is partially perpetuated by the common popular term, “roid rage,” which is not a scientific term at all. People often seem to think that individuals with ‘roid rage are prone to sudden outbursts of temper or sudden acts of violence. Although behaviors of this type may occur with steroids, it is more common that steroid users will develop chronic obsessional preoccupations that they cannot get out of their heads – a “slow boil” rather than a sudden loss of control. For example, I recall a participant in one of our earliest studies in the late 1980s who described that on one occasion when he was taking steroids, he ordered pancakes and specified that he did not want butter. The waitress nevertheless automatically brought butter with the pancakes. The participant reported that for days afterwards, he found himself constantly obsessed with this, even waking up in the middle of the night and angrily thinking “but why did she bring me butter when I had specifically specified that I did not want butter?” He reported that he had never experienced comparable obsessions at times when he was not using steroids.

To cite another example of this same obsessional, “slow boil” effect, I have described in a peer-reviewed paper⁴⁹ a steroid user (“Mr. A”) who worked as a prison guard. This man had no prior history of aggressive or violent behavior, no history of any psychiatric disorder, and no criminal record. On one occasion, while he was taking a course of steroids, when Mr. A was driving to the prison to start his shift, he experienced car trouble and asked to use the telephone at a nearby store to call the prison and explain that he would be late. The lady managing the store noticed his striped officer’s pants and joked “you officers use my phone so often I ought to start charging for it!” Mr. A found himself obsessing about this remark, feeling that the lady had belittled him. The angry obsessions continued through the night; he had trouble sleeping and his wife could not reassure him. The next day he returned to the store, grabbed the woman and physically forced her into his car. He reported that he had no sexual intent but wanted to “scare the lady in return for that remark she made to me.” As they were driving, Mr. A had to slow for some construction work. The lady seized the opportunity, jumped out of the car, and bolted away. Mr. A impulsively pulled his service revolver and shot her in the spine, leaving her with permanent paraplegia.

Mr. A was arrested and incarcerated almost immediately and was sentenced to 20 years in prison (See details in *State v. Woolstrum*, Supreme Court of Oregon 303 Ore. 332 | 736 P.2d 566, April 28, 1987). Three years later, when I interviewed him in the prison, he displayed his original mild-mannered premorbid personality and was perplexed that he could actually have committed such a crime. Interestingly, Mr. A had an identical twin, whom I also located and interviewed. The twin had also developed a passion for weightlifting but had never used steroids, and he had never displayed any violent or criminal activity. Full details of this case are presented in our 1990 paper.⁴⁹

Another example will again illustrate that steroids may cause individuals to engage in prolonged, systematic acts of aggression or criminal behavior, as opposed to merely causing sudden outbursts of temper or violence. This case, called “Mr. C” in our 1990 paper,⁴⁹ involved a 24-year-old man with no prior history of violence or criminal activity, who had taken low doses of steroids for several years, but then began a course of much higher doses at the age of 24. On these higher doses, Mr. C became more markedly self-confident, believing that he was “the best” and expecting others to treat him in a special way. He also became more reckless, on a couple of occasions taking a shotgun out with him and shooting at moving trucks or at lights. At about this time his fiancée broke off her engagement with him, and gradually Mr. C became obsessed with the idea that his ex-fiancée was “no good” and that “she ought to be killed.” With help from an acquaintance, Mr. C devised plan to install an explosive device in his ex-fiancée’s car that could be detonated remotely. He then installed and successfully detonated the device when the woman was in the car, but fortunately did not harm her. He was promptly arrested and, with no further access to steroids, quickly returned to his baseline personality. He was confused as to why he had become involved in such a violent activity, since he had never felt inclined to violence towards his fiancée or anyone else. Again I refer the reader to our earlier paper for the full details of the case.

As these examples illustrate, steroids may cause some individuals to develop prolonged, premeditated acts of aggression that typically exhibit an obsessional quality; the individual becomes chronically and pathologically preoccupied with a thought and cannot get it out of his head, often leading ultimately to a violent or criminal outcome.

Anosognosia (not being able to recognize that one is ill) is a common feature of steroid-induced psychological syndromes: One might ask why individuals who develop steroid-induced psychiatric syndromes would not recognize that they are behaving abnormally and hence check

their behavior or stop taking steroids entirely. In answer to this question, many or most steroid users who get these reactions are unable to tell that they are behaving abnormally until it is too late. This phenomenon is known in psychiatry and neurology as "anosognosia," a term indicating that the patient is unable to perceive that he is ill. With steroid users, it may be obvious to outside observers that they are markedly more aggressive than their normal selves, but very often, in my clinical and forensic experience, the steroid user himself experiences anosognosia, and literally cannot perceive that his actions are grossly abnormal. In short, he is unaware of how different he has become. Thus, after the user has been apprehended for a violent act and no longer has access to steroids, it is common that he will look back and be perplexed at how he could possibly have displayed such behavior at the time. This is illustrated in both the cases of Mr. A and Mr. C above.

5. My opinions regarding Mr. Sayoc

Based on the above discussion, I have three opinions regarding the psychiatric effects of steroids and the behavior of Mr. Sayoc. I express these opinions to a reasonable medical and psychiatric certainty.

First, it is my opinion that the scientific literature, together with my own clinical and forensic experience, has firmly established that steroids can precipitate profound behavioral reactions in some individuals who take these drugs. These reactions are typically characterized by inflated self-esteem, grandiosity, irritability, aggressiveness, violence, and sometimes criminal activity. The symptoms can occur not merely as a sudden outburst of behavior, but can manifest as prolonged angry obsessional thoughts that the individual cannot control – what I have referred to as a "slow boil" in my discussion above. Notably, the evidence indicates that these behavioral reactions are attributable to a biological predisposition, although the precise nature of this biology has not yet been established. Individuals who harbor this biological predisposition – even if they have no prior history of psychiatric disorder, violence, or criminal activity – may develop severe reactions to steroids while other similar individuals taking similar doses of steroids do not.

Second, it is my opinion that Mr. Sayoc was using large doses of steroids in October 2018 at the time that he devised pipe bombs (or more correctly "decoy" bombs that he knew would not actually explode) and sent them to various prominent political and celebrity figures. These doses of multiple steroids, all being adjusted simultaneously, were well into the range capable of producing behavioral reactions such as those described above.

Third, it is my opinion that Mr. Sayoc's psychological state on the steroids – feeling "invincible," becoming pathologically obsessed with what he perceived as the biases of the media and of political and celebrity individuals on the left, devising decoy pipe bombs to "scare" these individuals, and failing to appreciate that his behavior was grossly abnormal – is characteristic of the stereotypic psychological effects that I have observed in other individuals under the influence of large doses of steroids. Specifically, while Mr. Sayoc was under the influence of large doses of steroids, in the fall of 2018, he developed the same type of "slow boil" that I have described in the examples cited above. As in these other cases, he was unable to get the obsessive thoughts out of his head, leading ultimately to his actions of constructing and mailing the decoys.

Although it is notable that Mr. Sayoc has a past history of more minor crimes over the years (some of which may themselves have been potentiated by prior steroid use), his activity in the fall of 2018 extended far beyond any of his normal behavior and cannot reasonably be

explained simply on the grounds of his baseline personality. Therefore, it is my opinion that if Mr. Sayoc had not been using steroids in 2018, that the alleged crimes would not have occurred.

On the basis of these opinions, I would recommend that when and if Mr. Sayoc is released from prison, that he be required to submit to random urine testing for steroids as a condition of release. I believe that if he has no further exposure to steroids, the odds would be very remote that he would ever again commit a crime of comparable magnitude.

Please do not hesitate to get in touch with me if you have further questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "H.G. Pope, Jr.", written in a cursive style.

Harrison G. Pope, Jr., M.D.

References:

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EXHIBIT B

Date Prepared: 3/5/19

CURRICULUM VITAE

Name: Harrison G. Pope, Jr.

Address: 115 Mill Street, Belmont, MA 02478

Place of Birth: Lynn, Massachusetts

Education:

1969 A.B. Summa Cum Laude, Harvard College, Cambridge, Massachusetts

1972 M.P.H. Harvard School of Public Health, Boston, Massachusetts

1974 M.D. Harvard Medical School, Boston, Massachusetts

Postdoctoral Training:

Internship and Residencies:

1974-1977 Resident in Psychiatry, McLean Hospital, Belmont, Massachusetts

Research Fellowships:

1976-1977 Dupont-Warren Fellowship, Harvard Medical School

1977-1979 Fellowship, Charles A. King Trust, Boston, Massachusetts

1977-1981 Fellowship, Scottish Rite Schizophrenia Program, Northern Masonic Jurisdiction, USA

Licensure and Certification:

1975 Massachusetts License Registration

1980 Diplomate, American Board of Psychiatry and Neurology

Academic Appointments:

1974-1977 Clinical Fellow in Psychiatry, Harvard Medical School, Boston, Massachusetts

1977-1980 Instructor in Psychiatry, Harvard Medical School, Boston, Massachusetts

1980-1982 Clinical Instructor in Psychiatry, Harvard Medical School, Boston, Massachusetts

1982-1985 Assistant Professor of Psychiatry, Harvard Medical School, Boston, Massachusetts

1985-1999 Associate Professor of Psychiatry, Harvard Medical School, Boston, Massachusetts

1999- Professor of Psychiatry, Harvard Medical School, Boston, Massachusetts

Hospital Appointments:

1976-1980	Staff Psychiatrist, Hampstead Hospital, Hampstead, New Hampshire
1977-1984	Assistant Psychiatrist, McLean Hospital, Belmont, Massachusetts
1984-1992	Associate Psychiatrist, McLean Hospital, Belmont, Massachusetts
1984-	Chief, Biological Psychiatry Laboratory, McLean Hospital, Belmont, Massachusetts
1992-	Psychiatrist, McLean Hospital, Belmont, Massachusetts

Other Professional Positions and Major Visiting Appointments:

1977	Visiting Fellow, The Maudsley Hospital, London, U.K.
1977	Visiting Fellow, L'Hôpital Ste. Anne, Paris, France

Awards and Honors:

1969	Phi Beta Kappa
1974	The James Tolbert Shipley Prize, Harvard Medical School
1977	Harvey Shein Award, McLean Hospital
1984	Esquire Magazine Register of Outstanding Americans under 40
1988-	Who's Who in America
1990-	Who's Who in the World
1992-	Best Doctors in America
1997-	MERIT Award, National Institute on Drug Abuse
2003	Institute for Scientific Information Highly Cited Researcher in Psychology/Psychiatry
2003	Institute for Scientific Information Highly Cited Researcher in Neuroscience

Major Committee Assignments:

National

1979	Member, American Psychiatric Association Task Force on Nomenclature and Statistics, Advisory Committee on Schizophrenic, Paranoid, and Affective Disorders for DSM-III
1984	Member, American Psychiatric Association Task Force on Nomenclature and Statistics, Advisory Committee on Eating Disorders for DSM-III-R
1995	Member, Expert Consensus Panel to develop guidelines for bipolar disorder, Tri-University Consortium

Hospital

1990-	Member, Research Committee, McLean Hospital
1997-	Member, Ethics Committee, McLean Hospital

Editorial Boards:

1984-1991	Editorial Board, Psychiatrie et Psychobiologie, Paris, France
1984-	Editorial Board, International Journal of Eating Disorders, Los Angeles, California
1991-	Editorial Board, European Psychiatry, Paris, France
1993-	Editorial Board, The Journal of Clinical Psychiatry, Tucson, Arizona
1997-1999	Editorial Board, Journal of Bipolar Disorder, London, UK
2000-	Editorial Board, Scientific Review of Mental Health Practice, Atlanta, Georgia
2003-	Editorial Board, Body Image, Norfolk, VA

Advisory Boards:

1991-	Advisory Board, Center for Science Technology & Media
1992-	Scientific Advisory Board, False Memory Syndrome Foundation
1997-	Charter Member, Council for Scientific Medicine, The Scientific Review of Alternative Medicine
1998-	Professional Advisory Council, Neuroleptic Malignant Syndrome
1999-	Technical Advisory Group to the CASA National Commission on Sports and Substance Abuse

A. Report of Research

1. Major Research Interests:

Diagnosis and treatment of psychotic and affective disorders
Etiology and treatment of eating disorders
Psychopharmacology
Drug Abuse
The “repressed” and “recovered” memory controversy

2. Narrative Description of Research

I have performed studies in many different areas of biological psychiatry over the course of the years. Starting in the late 1970s, my work on the diagnosis and classification of psychotic and affective disorders helped to stimulate revised diagnostic criteria for these disorders in DSM-III and subsequent diagnostic manuals. In the early 1980s, I conducted

studies demonstrating the relationship of the eating disorders to major mood disorders, and was the first to publish a placebo-controlled, double blind study showing antidepressants to be effective in the treatment of bulimia nervosa. Throughout this same period, I conducted numerous studies in various aspects of psychopharmacology. Notable among these were the first published case series describing the "serotonin syndrome," a major series of studies investigating the neuroleptic malignant syndrome, several additional open-label and placebo-controlled, double-blind studies of antidepressants in bulimia nervosa, and studies of anticonvulsants in the treatment of major mood disorders. Among the latter was the first large placebo-controlled study to demonstrate that valproate was effective for the manic phase of bipolar disorder.

Starting in the 1990s, I focused increasingly on studies on substance abuse, including cannabis, hallucinogens, "ecstasy," and anabolic steroids. I have published extensively on the neuropsychological effects of long-term cannabis use and related topics; neuropsychological performance among long-term hallucinogen users; and the neuropsychological effects of "ecstasy" use. In the area of anabolic steroids, I have published numerous papers over the last 25 years covering various aspects of anabolic steroid abuse, with particular attention to the psychiatric effects of steroids; among other studies, I have conducted the largest placebo-controlled study looking at the psychiatric effects of supraphysiologic doses of steroids, and I have performed several field studies looking at attributes of illicit steroid users and risk factors for steroid use.

Also starting in the 1990s, I became interested in the important theoretical issue of "repressed memory," and have published a series of papers and a book assessing the validity of the concept of "repressed memory," and examining the related topics of childhood sexual abuse and other traumas.

Finally, in collaboration with Dr. James Hudson, I have pursued a series of studies on the concept of "affective spectrum disorder" – the hypothesis that there is a large group of psychiatric and medical disorders that may share a common and possibly heritable physiologic abnormality. Following an initial presentation of this hypothesis (reference number 100 below), we have published a series of additional papers, including reports of recent large family studies, exploring this issue.

My research activities also include teaching work with medical students, psychiatric residents, and junior investigators over the years, assisting them in conducting studies in numerous areas of psychiatry.

3. Research Funding Information:

Past:

1979-1981	NIDA - Co-Investigator Assessing the subjective effects of drugs in casual users
1981-1989	NIMH - Co-investigator Collaborative biological studies of schizophrenia
1982-1983	NIMH/Small grant - Principal Investigator Familial hyperkalemic periodic paralysis and manic-depressive illness: a linkage study
1986	Hoechst-Roussel Pharmaceuticals - Co-Investigator Nomifensine in the treatment of bulimia nervosa
1985-1986	Burroughs Wellcome Co. - Co-Investigator Bupropion vs. placebo in the treatment of bulimia nervosa
1986-1987	NIMH/R01 - Co-Investigator (Site Director) Test-Retest Reliability of the Structured Clinical Interview for DSM-III-R
1986-1987	Eli Lilly & Co. - Co-Investigator Fluoxetine vs. placebo in the treatment of bulimia nervosa
1986-1987	Mead Johnson Pharmaceuticals - Principal Investigator Trazodone vs. placebo in the treatment of bulimia nervosa
1987-1989	Abbott Laboratories - Principal Investigator Valproate vs. placebo in the treatment of acute mania
1988-1989	Eli Lilly & Co. - Co-Investigator Fluoxetine vs. placebo in the long-term treatment of bulimia nervosa
1990-1991	Eli Lilly & Co. - Co-Investigator Fluoxetine vs. placebo in the treatment of kleptomania
1991-1992	Glaxo Pharmaceuticals - Co-Investigator Ondansetron vs. diazepam vs. placebo in the treatment of generalized anxiety disorder
1991-1992	Eli Lilly & Co. - Co-Investigator Zatosetron vs. lorazepam vs. placebo in the treatment of generalized anxiety disorder

1991-1992	Abbott Laboratories - Co-Investigator Long-term follow-up of manic patients treated with valproate
1990-1993	NIDA/RO1-06543 - Principal Investigator Psychiatric effects of anabolic steroids
1990-1994	Harvard Medical School/Milton Fund - Co-Investigator Genetic epidemiology of affective spectrum disorder
1991-1994	NIDA/RO1-06522 - Principal Investigator Neuropsychological effects of marijuana in college students
1992-1993	Ciba-Geigy Co. - Co-Investigator Brofaromine vs. placebo in the treatment of social phobia
1992-1994	Pfizer, Inc. - Co-Investigator CP-93,393 vs. placebo in the treatment of generalized anxiety disorder
1992-1994	Pfizer, Inc. - Co-Investigator CP-93,393 vs. placebo in the treatment of major depression
1993-1994	The Upjohn Co. - Co-Investigator Fluvoxamine vs. placebo in the treatment of binge eating disorder
1993-1994	Ciba-Geigy Co. - Co-Investigator Placebo-controlled, dose ranging trial of oxcarbazepine in hospitalized inpatients with acute mania.
1993-1995	Abbott Laboratories - Principal Investigator Safety and efficacy of Depakote in the prevention of mania in patients with bipolar disorder.
1994-1996	Glaxo, Inc. - Co-Investigator Ondansetron vs. placebo in the treatment of panic disorder
1994-1996	The Upjohn Co. - Co-Investigator Pramipexole vs. placebo in the treatment of severe depression
1995-1996	GlaxoWellcome. - Co-Investigator Family study of panic disorder
1994-1996	Pfizer, Inc. - Co-Investigator CP 93,393-1 in patients with major depressive disorder

1993-1997	NIDA/R01-DA06543 - Principal Investigator Psychiatric Effects of Testosterone in Normal Men
1996-1997	Pfizer, Inc. Co-Investigator CP 93,393-1 vs. placebo in the treatment of generalized anxiety disorder
1996-1997	Pfizer, Inc. - Co-Investigator CP 93,393-1 vs. fluoxetine vs. placebo in the treatment of major depressive disorder
1996-1997	Eli Lilly & Company - Co-Investigator Fluoxetine vs. placebo in bulimia relapse prevention
1996-1998	NIDA/R01- DA10055 - Principal Investigator A Controlled Study of Anabolic Steroid Use in Women
1997-1998	Glaxo Wellcome, Inc. - Principal Investigator Evaluation of Lamotrigine in the long-term prevention of mood episodes in patients with rapid cycling bipolar disorder
1996-2000	NIDA/R01- DA10346 - Principal Investigator Cognitive Consequences of Long-Term Marijuana Use
1998-2000	CEASE, Inc. - Principal Investigator Development of a website to educate people about abuse of anabolic androgenic steroids
1999-2001	Webster Foundation – Principal Investigator Affective Spectrum Disorder
1999-2002	CEASE, Inc. – Principal Investigator Substance Use in Male Weightlifters
2001–2002	Unimed Pharmaceutical Co., Inc. – Principal Investigator Testosterone gel in men with major depressive disorder with low or borderline testosterone levels
2000-2004	NIDA/R37-DA10346 (MERIT AWARD)– Principal Investigator Cognitive consequences of long-term marijuana use
2003-2005	Ortho-McNeil Pharmaceutical – Co-Investigator Topiramate vs. placebo in the treatment of binge eating disorder

- 2005- 2007 Eli Lilly & Company – Principal Investigator
A Comparison of LY686017, Paroxetine, and Placebo in the Treatment of Social Anxiety Disorder
- 2006-2008 Solvay Pharmaceuticals – Principal Investigator
A Parallel-Group, Placebo-Controlled Trial of Androgel in Men with Major Depressive Disorder Who Display an Incomplete Response to Standard Antidepressant Treatment
- 2002-2009 Ortho-McNeil Pharmaceutical – Co-Principal Investigator
Family and genetic study of binge eating disorder
- 2005-2009 NIDA/R01 DA 017953 – Co-Investigator
Neurocognitive consequences of long-term ecstasy use
- 2005-2010 NIDA/R01 DA16744-01 A2 – Principal Investigator
Risk factors for anabolic-androgenic steroid abuse
- 2010-2012 Otsuka Pharmaceutical – Co-Investigator
Escitalopram vs. escitalopram plus aripiprazole for treatment of major depressive disorder.
- 2010-2012 Brainsway – Co-Investigator
Randomized controlled trial H-Coil deep Transcranial Magnetic Stimulation in major depressive disorder
- 2011-2012 Shire Pharmaceuticals, Inc.- Co-Investigator
A Phase 2, Multicenter, Randomized, Double-blind, Parallel-group, Placebo-controlled, Forced-dose Titration Study to Evaluate the Efficacy, Safety, and Tolerability of SPD489 in Adults Aged 18-55 Years with Binge Eating Disorder

Current:

- 2011-2015 NIDA/R01 DA029141-01A1 – Principal Investigator
Medical Consequences of Long-Term Anabolic-Androgenic Steroid Abuse

Principal Clinical and Hospital Service Responsibilities:

- 1977-1979 Psychiatrist-in-Charge, Clinical Evaluation Unit for Study of Psychotic Disorders, Laboratories for Psychiatric Research, McLean Hospital
- 1990- Research Committee, McLean Hospital

B. Report of Teaching:

Local Contributions

McLean Hospital

- | | |
|-------|--|
| 1980- | Psychopathology
Lecturer on psychiatric disorders and eating disorders
10-12 residents in psychiatry
1-3 hours/year |
| 1982- | Psychopharmacology
Lecturer on pharmacologic treatment of psychotic disorders and eating disorders
10-12 residents in psychiatry
1-3 hours/year |
| 1983- | Psychopharmacology
Lecturer
8-10 medical students
1 hour/year |
| 1991 | Psychopharmacology Luncheon
Speaker on psychotic disorders, eating disorders, and substance abuse
20-30 staff psychiatrists, residents in psychiatry, and other hospital staff members
2 hours/year |
| 1993- | Psychopharmacology
Supervise PGY-III residents on consultation service
6-10 residents/year
24 hours/year |
| 1993- | Alcohol and drug abuse
Lecturer on substance abuse
20-50 staff psychiatrists, residents in psychiatry, and other hospital staff
2 hours/year |

Massachusetts Mental Health Center

- | | |
|------|---|
| 1986 | Psychopathology
Lecturer on diagnosis of psychotic disorders
10-12 residents in psychiatry
2 hours |
|------|---|

Massachusetts General Hospital

- | | |
|------|--|
| 1994 | Psychopathology/case presentation and discussion
Residents in psychiatry and nursing staff
2 hours |
| 2010 | Grand Rounds
Anabolic-Androgenic steroid dependence: a looming public health
problem?
2 hours |

Harvard Medical School

- | | |
|-----------|---|
| 1995-2004 | Alcohol and drug abuse
Lecturer on substance abuse
10-15 medical students
2 hours per year |
|-----------|---|

Harvard College

- | | |
|-------|---|
| 2004- | Anabolic steroid and ecstasy abuse
Lecturer on substance abuse for Dr. Franz Schneider
12-15 students
2 hours per year |
|-------|---|

Children's Hospital

- | | |
|------|--|
| 2008 | Lecture on anabolic steroid abuse to orthopedic residents
10 students
2 hours per year |
|------|--|

Advising Responsibilities

- | | |
|-------|--|
| 1982- | Supervisor for residents in psychiatry on clinical and research activities
1-2 residents/year |
| 1990- | Preceptor for residents in psychiatry
1-2 residents per year |

Regional, National, and International Contributions

Invited Presentations

- 1982- Lectures at approximately 50 regional and national courses and grand rounds on psychotic disorders, eating disorders, psychopharmacology, and substance abuse sponsored by academic institutions, hospitals, professional societies, and self-help organizations
- 1984 Invited Speaker, International Conference on Eating Disorders
- 1986 Plenary Speaker, International Conference on Eating Disorders
- 1986 Invited Speaker, Second International Conference on Eating Disorders, Sydney, Australia
- 1986 Chairperson, Symposium on Neuroleptic Malignant Syndrome American Psychiatric Association, Washington, DC
- 1990 Chairperson, Symposium on Anticonvulsants in Treatment of Psychiatric Disorders, American Psychiatric Association, Montreal, Canada
- 1996 Gast professor (Guest Professor)
Department of Psychiatry, University Clinics of Innsbruck, Innsbruck, Austria

Teaching of Research Methods to Junior Investigators:

- 1981- Principal teaching activity since 1977 has been the teaching of junior investigators in how to design, conduct, and publish research studies. Over the last 30 years, more than 50 trainees have collectively become co-authors with Dr. Pope on more than 100 original articles in peer-reviewed journals.

C. Clinical Activities

1. Short report of clinical activities

- 1977- General private clinical practice of psychiatry, with emphasis on biological treatment of patients with psychotic disorders, major mood disorders, and eating disorders. Current practice is restricted to consultation time averaging less than four hours per week.

EXHIBIT C

Michael B. First, M.D.

55 Berry Street #6E

Brooklyn, NY 11249

Phone: 646-774-7935

Fax: 646-774-7933

e-mail: mbf2@columbia.edu

July 22, 2019

Sarah Baumgartel
Amy Gallicchio
Ian Marcus Amelkin
Assistant Federal Defenders
Federal Defenders of New York, Inc.
10 Duane St., 10th floor
New York, NY 10007

Re: United States v. Cesar Altieri Sayoc, 18 Cr. 820 (JSR)

Dear Ms. Baumgartel, Ms. Gallicchio, and Mr. Marcus Amelkin:

Mr. Sayoc is a 57 year old male who is currently incarcerated at the Metropolitan Correctional Center in Manhattan awaiting sentencing, after having pled guilty on March 21, 2019 to 65 felonies, including use of weapons of mass destruction and interstate mailing of explosives. At your request, I have conducted a forensic psychiatric evaluation of Mr. Sayoc.

Material Reviewed

- 1) Interviews of Cesar Sayoc at MCC, December 10, 2018 (4 hours, 20 minutes), April 3, 2019 (2 hours, 25 minutes), June 14, 2019 (3 hours, 10 minutes)
- 2) Telephone interview with Madeline Giardiello, mother, May 28, 2019 (35 minutes) and June 11, 2019 (45 minutes)
- 3) Telephone interview with Kim Sayoc, cousin, June 6, 2019 (25 minutes)
- 4) Telephone interview with Christine Villasana, sister, June 6, 2019 (50 minutes)
- 5) Telephone interview with Johnny Griffin, high school friend June 6, 2019 (15 minutes)
- 6) Letter from Stuart Mermelstein, attorney at Herman Law to Brother Bernard Convillion, President St. Stanislaus Boarding School, dated September 26, 2013 re: Claim of Cesar Sayoc against St. Stanislaus Boarding School for child sexual abuse
- 7) Report of Dr. Harrison Pope, Jr., dated June 19, 2019
- 8) MCC Medical Records 12-19-18 to 6-3-19
- 9) St. Stanislaus yearbook photos of Mr. Sayoc

- 10) College transcript – UNC Charlotte
- 11) Criminal complaint – October 28, 2018
- 12) Indictment – dated November 9, 2018
- 13) FBI Laboratory device report – dated January 2, 2019
- 14) Court order re: letter from Mr Sayoc to Judge Rakoff, dated April 5, 2019
- 15) Handwritten letters from Mr. Sayoc to Judge Rakoff, undated, scanned April 18, 2019
- 16) Criminal history rap sheets
- 17) Miami-Dade bomb threat case file – August 27, 2002
- 18) Video recording of Mr. Sayoc's Quarles interview
- 19) Photographs of devices and packages
- 20) Photographs of Mr. Sayoc's van
- 21) LA Fitness records
- 22) Summary of FBI interview with Philip Costa (manger at Solid Gold and Pure Platinum nlgihtclubs), Antonio Fontana (friend for 30 years), Madeline Giardiello (Sayoc's mother), Joseph Giardeillo (stepfather), Cristina Villisana (Sayoc's sister); Ahmad Idris (services Sayoc's computer), Carey Jannelli (floor man at Ultra Gentleman's club), Michelle Smith (DJ at Ultra Gentleman's Club), Kelsey Cawley (patron at LA Fitness gym), Freddy Petit-Beau (patron at LA Fitness Gym), Angela Marie Mason (bartender at Ultra Gentleman's Club), Joe Saccal nightshift manager at Ultra Gentleman's Club), Stacey Saccal (daytime shift manager at Ultra Gentleman's Club), Kimberly Wallace Sayoc (cousin), Steven Sayoc (cousin), Michelle Smith (bartender at Ultra Gentleman's Club), Jamie Sukel (trained Sayoc on DJ duties), Mario Grondin (friend of Mr. Sayoc), Robert Petrocelli (Sayoc's accountant), Estelle Petrocelli (Sayoc's accountant).

Mr. Sayoc's Background and Social History

Mr. Sayoc's mother (Madeline Giardiello) and his Filipino father (Cesar Z. Sayoc, Sr.) met in hairdressing school in 1960 in New York City. According to Ms. Giardiello, her husband was the "black sheep" of his family of nine children. Cesar Sayoc Sr.'s father was a famous plastic surgeon in the Philippines, and almost all of his siblings ended up as surgeons or other health care professionals. After finishing hairdressing school, they eloped in Las Vegas because her parents were not accepting of her marrying anyone other than another Italian American. Cesar Sr. and Madeline opened up a hairdressing salon together in Brooklyn called Madeline's Coiffures, and for most of their 8-year marriage worked side-by-side running hairdressing salons. Cesar Sayoc, Jr. (the defendant) was their first-born child (in 1962), followed a couple of years later by the birth of his sisters Sabrina and Christina. When Cesar Jr. was around age 3 and a half (and Sabrina age 2), the family moved to Florida, with Ms. Giardiello's parents following a couple of years later.

Ms. Giardiello described her husband Cesar Sr. as "dark, handsome and a good dancer." According to Ms. Giardiello, her son would spend a lot of time at his grandparents who lavished him with attention and spoiled him ("Cesar could do no wrong with my parents."). In addition to the business of hair salons, they decided to start a new business which involved importing wooden salad

bowls and placemats from the Philippines and selling them to tourists in Florida. Mr. Sayoc's father would go twice a year to the Philippines for a couple of months at a time to do this, eventually telling his wife that he needed her to send him sums of money to set up a factory to make the salad bowls ("thousands of dollars at a time"). At some point, Ms. Giardiello discovered that there was in fact no factory in the Philippines, and that her husband was spending the money she sent for drugs, gambling, and "womanizing." ("He was a habitual liar towards the end."). They soon got divorced ("I got the salons and he got the import business") and he went to the Philippines never to return ("he was supposed to give us \$25 a month but he just left and disappeared...never even a postcard").

Mr. Sayoc, who was 5 or 6 at the time, was devastated by his father leaving the family and, according to his mother, "went into a shell." According to Ms. Giardiello, Mr. Sayoc and his father were very close, and before he left, he told Mr. Sayoc that he was going to return and bring him to the Philippines. For years afterward, Mr. Sayoc would repeatedly insist that his father was eventually going to come and take him to the Philippines. It was at this point that Mr. Sayoc underwent a significant change in his personality, going from being outgoing and social to becoming very introverted ("he didn't want to talk to anybody—he would go into his bedroom to eat") and started having behavior problems. According to his mother, he would talk back, would not listen to what was told to him, and seemed angry all of the time ("when he wouldn't get his way he would have temper tantrums. He would go out and slam the door behind him"). Concerned about his behavior, Ms. Giardiello took him to a doctor who said his problems were due to the separation from his father. Ms. Giardiello decided to enroll her son in a pre-military boarding school in Fort Lauderdale called the Florida Air Academy for 4th grade ("I needed discipline" according to Mr. Sayoc) and then in 5th grade he went to the Gables Academy, a day school on the campus of the Florida Air Academy. After he continued to have behavioral problems, his mother enrolled him for 6th grade at St. Stanislaus, a Catholic boarding school in Bay St. Louis, Mississippi, "where he would gain discipline and structure in his life."

At St. Stanislaus, Mr. Sayoc was sexually molested by Brother Raymond, a priest who was in charge of the residence and who had a room in the boys' dormitory. According to a lawsuit that lawyers on behalf of Mr. Sayoc brought against St. Stanislaus,

after the boys had gone to sleep at night in their bunks, Brother Raymond came to Cesar's top bunk. Initially Brother Raymond pulled Cesar's pants down and fondled Cesar's genitals. He then took Cesar to his room where he forced Cesar to perform oral sex on him and sodomized Cesar. This abuse occurred on a nightly basis. Brother Raymond isolated Cesar and would not let him call his mother. Cesar attempted to report this abuse to school officials which was difficult for Cesar, particularly since he had a stuttering problem exacerbated by the efforts of the abuse. When Cesar ultimately reported the abuse, however, he was laughed at and told he was crazy. Nothing was done. As a result, Brother Raymond continued to terrorize and sexually abuse Cesar on a nightly basis during the course of that school year.

Mr. Sayoc reported that the sexual abuse would happen virtually every night. “He started kissing me and then he would take my pants down and anally rape me; I would wear 3 or 4 pairs of pants during the day to protect myself.” One night, after Brother Raymond fell asleep after a molestation session, Mr. Sayoc escaped from Brother Raymond’s bedroom and called his mother, pleading with her to come and get him out or else he was going to kill himself. According to Mr. Sayoc, “I never told her about what Brother Raymond did—you are supposed to protect the church.” Mr. Sayoc in fact told absolutely no one about his abuse for over 35 years until around 2013, when he broke down and told a friend from work about what had happened to him. His friend encouraged him to contact a lawyer and file a lawsuit against St. Stanislaus. Mr. Sayoc recounted “sitting through 10 hours of depositions in front of a camera during which they ripped me apart.” Because he could not remember the names of his roommates at the time (“I didn’t want to say the wrong names—it was almost 40 years ago—all I knew was that there was a kid with curly hair and braces”), the lawyers for the school accused him of having made it all up, and Mr. Sayoc ended up accepting a settlement of only \$6,000. His mother did not find out about the abuse until 6 years ago, when Mr. Sayoc told her during an intense argument with her that he had been repeatedly abused during his year at St. Stanislaus. According to Ms. Giardiello, “Cesar never told anybody. I thought he would come back from St. Stanislaus fine. But after he came back, he went into real seclusion at times and then would go wild for no good reason at other times and I didn’t know why.”

According to Mr. Sayoc, he believed that his mother knew that something was wrong (“she was being protective of me”) and enrolled him in Miami Country Day School for 7th grade (“she wanted the best—she somehow paid the money”). He switched to public school starting in 8th grade, first at JFK Junior High School (“I was in class for students with learning disabilities”) and then North Miami Beach High School (“I was a shy, skinny kid and got C’s, D’s, and F’s.”) where he started playing soccer and by senior year was captain of the team. According to Ms. Giardiello, Mr. Sayoc lived with her and his sisters until age 18. He then went to live with his grandmother and grandfather in Hollywood, Florida for about three years. After an incident where he pushed his grandfather down, they demanded that he had to move out. His grandfather ultimately had to call the police to remove Mr. Sayoc from the house because he did not want to leave. According to Mr. Sayoc, “I was so jacked up on steroids—they had to call the sheriff to get me out of the house.”

After high school Mr. Sayoc attended Brevard College for a year and a half but could not recall why he left in the middle of his second year (“I wished I had stayed; I punish myself for that”) and then worked in construction for his stepfather. He then got a scholarship to play soccer at the University of Central Florida but, “my phobias were kicking in—phobias of taking tests and meeting people” and he quit school before the season started (“it was the biggest mistake I have ever made—I was overwhelmed going from a small school to a big school; I could have done very well in soccer—I was on the starting team”). He then enrolled at UNC Charlotte but he ended up dropping out.

Mr. Sayoc reports that he had a dry-cleaning business from 2002 to 2003 and that it was during this period when he got into legal trouble with Florida Power and Light. According to Mr. Sayoc, “they tried to extort \$174 from me. I told them that I had given them three deposits already and they wanted a fourth deposit. I got very angry and it turned into a terrorist threat. It was because I was on steroids.—I apologized.” According to a Miami-Dade police file, Mr. Sayoc was arrested on August 20, 2002 and charged with a “threat to place an explosive device.” According to the file, Mr. Sayoc “contacted a representative at Florida Power and Light by telephone and threatened to blow up Florida Power and Light in a way that would be worse than 9/11. He also threatened that something would happen to the representative if they cut his electricity.” Mr. Sayoc pled guilty to the charge on December 3, 2002. The court ruled that “upon hearing of the matter, that the defendant is not likely to engage in a criminal course of conduct and that the ends of justice and welfare of society do not require that the defendant shall not suffer the penalty imposed by law” and that the adjudication of guilt be stayed and withheld.

Mr. Sayoc says he worked at seven different clubs over the years and harbored dreams of one day opening up his own club, a dream which never came to pass. His jobs at the clubs included being a bouncer, being a floor host (which involved greeting patrons and finding seating), being an MC for the show which entailed introducing the girls, being a lap dance counter, and being a DJ. Eventually he got a job working at Tootsie’s Cabaret, a Gentleman’s club in Miami starting in 2006, where he was a dance counter (“The money at Tootsie’s is the best—I was working 110 hours a week and was making between \$7000 and \$11,000 at week”). He bought a \$385,000 house on Coral Ridge Island. Mr. Sayoc eventually lost his job at Tootsie’s in 2008. Mr. Sayoc soon lost his house because he could no longer keep up the mortgage payments and filed for bankruptcy. It was at this point that Mr. Sayoc decided to live in his van.

Mr. Sayoc spent 7 years on the road as an exotic male dancer, going from club to club with five other men, a van, and a trailer. Besides dancing, he ran the business and did all of the bookings from the road on a cellphone. Mr. Sayoc reported that he felt empowered at the time (“I finally found something—I was an owner and I was happy. I finally had friends—the five of us would do stuff together. I did this to help kids—I took the dancers off the street.”) But he soon found out that his partner in the business started booking shows with some of the dancers behind his back: “I was so devastated and hurt—at a low point—I thought we were brothers.” Eventually he decided that he was too old to continue travelling around as a male dancer and returned to the South Florida area. In addition to going back to work at the clubs, he also worked for Papa John’s doing pizza delivery (“If I knew about how steady the work was delivering for Papa John’s, I would have done that much earlier.”)

Mr. Sayoc describes his affiliation with Donald Trump as follows: “I was at a low in 2014 and then here comes Donald Trump. I didn’t know from politics, (my mom was a Democrat) but I related to him. He lost \$952 million and now he is a billionaire. This was the worst time for me for him to come around. Trump is for the forgotten people. I was so down, you get sucked in. I sent in \$100

and got stickers for the van. After Trump was elected, I spent \$2000 to go to the inauguration—I was on the train coming back and this woman was angry about Trump being President and started throwing stuff. I came back and started watching more and more of Fox News. Then you hear from ‘radical Hannity’ that this is the most important mid-term election in history. I covered my van with stickers and was attacked because of the stickers. They knifed my tires. They broke my windows and then they broke in and stole my stuff. They did \$18,000 damage to the van. But the more it was attacked, the crazier I got and the more stickers I put on the van. You just wanted it to stop—but there was no way to stop it. I was fine in the presidential election—but then came the mid-terms. I felt that all of the Democratic Party leadership was encouraging the attacks on my van.”

Psychiatric History (including Psychiatric and Psychological Treatment at MCC)

Mr. Sayoc started taking anabolic steroids at the age of 15 while he was in high school. According to Mr. Sayoc, he started taking them to build his confidence: “I was a small tiny skinny shy kid that the other kids made fun of and bullied. You are a little guy—I took steroids to build confidence. I was scared to approach girls—I would wait for them to come up to me. My biggest fear is rejection— that they are going to say no.” Mr. Sayoc reported that he was introduced to steroids in the gym. “I started orally with anadrol 50 but then later started taking steroid injections. You are supposed to take them only once a week but I was injecting myself every day. I felt that a little bit wasn’t working. It increased my confidence. My body started growing. People started to notice and were making good comments. I basically took them every day for 40 years. I also took lots of vitamins and growth hormone.” When asked what impact the steroids had on his thinking and mood, he reported that “it gave me mood swings and memory loss. I would feel vulnerable, uptight, and impatient. Sometimes feel like I’m going insane.” When asked why he continued to take the steroids if it was affecting him in this way, he replied “it made me feel strong and good about myself. I felt I really needed them.”

At MCC, Mr. Sayoc was first seen by Psychology at his request on December 19, 2018. According to the note, he appeared down about being in the SHU and not in general population and also appeared to be thinking about past events that have occurred in his life. He was offered self-help books. In a January 3, 2019 monthly review note, Mr. Sayoc displayed no evidence of depression or suicidality and appeared to be adequately adjusting to SHU placement. He was then seen on January 18, 2019 after a self-referral reported that he was feeling depressed and anxious because of his past and that he was also anxious because he is not accustomed to being in jail. Mr. Sayoc again asked to speak with a psychologist on January 29, 2019 because he was feeling “significant depression” and asked whether he could be referred to a hospital for mental health treatment. He was reported to be tearful throughout the appointment, saying he was “trying to figure out how this happened.” He recounted several incidences of abuse against him throughout his life, including childhood sexual abuse and feeling slighted and attacked in adulthood. He reported feeling disappointment when comparing himself to family members who he believes have been more successful than him, which

he attributes to untreated mental health issues. He reported hopes that his recent work with Psychology staff at MCC-NY, will help him to come to terms with some of these suppressed difficulties from his past.

Mr. Sayoc was next seen for a follow-up visit on March 6, 2019 when he was reported to be tearful and expressed regret and confusion about his current situation. He expressed his belief that others' treatment of him led him to react in an extreme way. He was seen again on March 28, 2019 for a monthly clinical contact. Mr. Sayoc reported that he was worried about his upcoming court date and that he had trouble sleeping and was "hearing voices." He explained these legal decisions have been keeping him occupied. During a session on April 3, 2019, Mr. Sayoc expressed his frustration with the current status of his case and explained that he continued to feel "not himself." He further stated that he feels distracted, emotionally reactive, and anxious. He spoke about his past experiences of fears of failure and rejection, including test taking. He attributed his lack of career development and romantic relationships to these "phobias." He indicated his interest in taking some steps now to improve his coping skills, including focusing on some of his interests and hobbies. Mr. Sayoc was seen again on April 12, 2019 and expressed continued concern about the status of his case. He also noted difficulty using coping skills, as he reported his mind quickly returning to anxiety related to his case.

Mr. Sayoc was next seen on April 20, 2019 because of a monitored telephone call to his mother in which he was overheard to say that when he was in SHU when he first arrived, he tried hanging himself for 30 minutes each night, but the string broke. During the interview, Mr. Sayoc stated that he was overwhelmed with his case. When asked about using a string when he was in the SHU, he stated it was for the first one or two months and was then vague. He then stated when he was in the SHU, at night he would hear voices saying "'we're back' and see electricity shooting out of objects." He said at that time that he thought his life was over, but then stated he was dealing better now. He denied current suicidal and thoughts of self-harm as well as current auditory or visual hallucinations. According to the note, he exhibited a dysphoric mood with a restricted range of affect.

On May 1, 2019, Psychology performed a suicide risk assessment in reaction to an e-mail received in the Inmate to Psychiatry inbox from another inmate on April 30, 2019 stating "I would like to inform you that an inmate in my unit has been talking about suicide for a couple of days."

According to the Psychology note, Mr. Sayoc reported that he believes he suffers from Depression and PTSD, and he further reported a history of self-diagnosed mental health issues such as Bipolar Disorder, ADHD, and "split personalities," but there is no documented or known history of such diagnoses from a mental health professional. He denied suicidality but expressed hopelessness and extreme sadness. He discussed his belief he is in "hell" in this institution. He referenced regret about his past, feelings of having been victimized by others for most of his life, and reported that he was unable to focus on other issues because he is occupied by his feelings of sadness and painful memories. Because it was determined that his risk factors for suicide (i.e., depressed mood, visible ligature mark on his neck, inmate peer having expressed concern for Mr. Sayoc's safety, history of

suicidal ideation on admission, and expressing current concern that he does not know what the future holds, and, making attempts to “tie up loose ends,”) outweighed protective factors (such as denying any suicidal ideation, intent, or plan, having a mother who has been supportive to him, not being opposed to the possibility of taking psychotropic medication), it was decided that he required placement on Suicide Watch. On May 2, 2019, Mr. Sayoc was evaluated by the psychiatrist who noted that his only current symptom was anxiety related to his case. Mr. Sayoc was diagnosed with current Adjustment Disorder with anxiety, and prescribed buspirone (a medication for anxiety), 15 mg twice a day. On May 2, 2019 he was evaluated again regarding the need for suicide watch. Mr. Sayoc adamantly denied current suicidal and thoughts of self-harm. He said that for a few weeks now, there was an inmate on his Unit that had been telling him to say that he wants to kill himself and go on Suicide Watch. Mr. Sayoc stated he now realizes that he should have not taken this inmates advice and said that although this inmate had well-meaning intentions, his advice was not helpful and he now he sees that this inmate did not know what he was talking about. Based on this evaluation, Mr. Sayoc was taken off suicide watch (total time on Suicide watch was 13 hours). During his May 30, 2019 evaluation, Mr. Sayoc stated that he continued to take the buspirone but that it makes his feel sluggish. The psychologist reported that he was psychiatrically stable at that time.

Mr. Sayoc reported that the only time in his life that he was depressed for more than a couple of days (prior to being incarcerated) was when his grandfather died. Mr. Sayoc has a number of odd beliefs that fall just short of being considered psychotic. For example, although he often has had the feeling that someone was out to get him, he did not believe this so strongly that it would be considered delusional, i.e., he could entertain the possibility that it might not be true. Mr. Sayoc also endorsed a strong belief in the power of a shop owner who is a practitioner of Santeria to influence the future. Since 1998, he has made regular visits to a shop in Pompano Beach, Florida called St. Lazarus Botanica. According to an April 15, 2009 article in the Chicago Tribune, its owner, Lisa Masso, describes herself as a “spiritual guide” who prepares candles with different herbs, powders, oils and coloring that promise quick prosperity. According to Mr. Sayoc, “she is gifted with powers—they work through the candles. She puts your wish on yellow parchment paper, like a picture of the Gentleman’s club where I wanted to get a job, or a picture of Trump in order to get him to win the election. In 1998, I was having a lot of problems – I had stupid petty things on my criminal record that were preventing me from getting a job. Someone said you need to seek Lisa at St. Lazarus Botanica in Pompano Beach. That’s when I started to go to her – I would go once a week – She would use Tarot cards and candles to clear up problems. For example, she put handcuffs on a plate to clear up my criminal record. She put the name of the apartment I wanted to live in on a piece of paper and a photo and then I got the apartment. Then later I started to do political wishing. When the Democrats wished bad on Donald Trump, she did a reverse wish so that bad would come to the Democrats. I had 300 pictures that they found in my van that I used to help her put reverse wishes. It cost from \$20.00 a candle to \$65.00 a candle and sometimes I would do 20 candles at a time. I used to leave the candles lit in the van. Anything the Democrats tried to attack – anything they wished – you reverse the candle by writing ‘kill’ on the candle. If I had a boss

wishing evil on me, you would put his picture in the candle, say ‘kill’ and the reverse evil would happen. The FBI saw this and thought it was a ‘kill list.’ They saw all of these wishes, like ‘kill Barack Obama.’ It doesn’t mean I wanted Obama to be killed; it means ‘kill his evil against Donald Trump.’” Although Mr. Sayoc is completely convinced of the truth of these beliefs, such beliefs are not considered to be evidence of delusional thinking because these beliefs are widely shared by a significant portion of the South Florida and Caribbean communities.

Diagnostic Impression:

At the time of his instant offense, Mr. Sayoc was suffering from a combination of both steroid-induced mental disorder with manic-like features (grandiosity, irritability, anger, impulsivity, mood lability, poor judgment) along with a severe personality disorder. A personality disorder is an enduring pattern of inner experience and behavior characterized by a variety of maladaptive traits, is pervasive and inflexible, has an onset in adolescence or early adulthood, is relatively stable over time, and causes significant impairment in occupational, social, or other important areas of functioning. Mr. Sayoc has a number of inflexible maladaptive traits that have impaired his functioning during his lifetime. They include the following: (from DSM-5, pages 779-781)

- **Emotional lability** (“instability of emotional experiences and mood, emotions that are easily aroused, intense, or out of proportion to events and circumstances”). This was observed during the psychiatric examinations as well as in his interactions with his defense lawyers.
- **Submissiveness** (“adaptation of one’s behavior to the actual or perceived interests and desires of others even when doing so is antithetical to one’s own interests, needs, or desires”). There are many examples of Mr. Sayoc putting other people’s interests and desires before his own, which usually ended up in Mr. Sayoc being taken advantage of.
- **Withdrawal** (“Preference for being alone to being with others; reticence in social situations; avoidance of social contacts and activity; lack of initiation of social contact”). Mr. Sayoc has a long history of social reticence, shyness, and fear of rejection as described above.
- **Suspiciousness** (“Expectations of—and sensitivity to—signs of interpersonal ill intent or harm; doubts about loyalty and fidelity of others; feelings of being mistreated, used, and/or persecuted by others”). Mr. Sayoc constantly reports feeling that he has been mistreated and used by others throughout his life.
- **Unusual beliefs and experiences** (“Belief that one has unusual abilities, such as mind reading, telekinesis, thought-action fusion, unusual experiences of reality, including hallucination-like experiences.”) Even though Mr. Sayoc’s beliefs in the ability of Lisa Massa at St. Lazarus Botanica are not considered to be evidence of a delusion, they do qualify as “unusual beliefs and experience” as part of this personality trait.

The psychiatric changes caused by his steroid use, working in concert with his maladaptive personality traits like emotional lability and suspiciousness, caused him to act out in a self-destructive way, such as when he angrily threatened the Florida Power and Light because he felt he was being taken advantage of.

Forensic Psychiatric Opinion

It is my opinion, to a reasonable degree of medical certainty, that both his severe personality disorder and the effects of chronic steroid use have significantly contributed to Mr. Sayoc's criminal behavior in the context of this case (i.e., sending 16 packages through the U.S. mail to various individuals whom he perceived to be critical of Donald Trump and encouraging attacks on his van). Mr. Sayoc has an over 40-year history of chronic close-to-daily self-administration of high doses of anabolic steroids in order to build up and maintain muscle mass, right up to the time of his arrest. There were several psychological motivations behind his almost religious devotion to taking the steroids and his spending hours in gyms obsessively using weight machines. First of all, Mr. Sayoc has partly attributed his being victimized by Brother Raymond at the Catholic boarding school to the fact that he was a particularly scrawny weak child of small stature who could not defend himself. After having survived the daily trauma of being the victim of coercive sexual abuse, he wanted to never again be in a position where he could not defend himself against an attack. Secondly, Mr. Sayoc has a life-long history of very low self-esteem which started after he was abandoned by his father. The fact that his father promised Mr. Sayoc that he would return some day and bring him to the Philippines to live with him, a promise which he failed to keep, was interpreted by the young Mr. Sayoc as indicating that he was not worth coming back for. The steroids transformed Mr. Sayoc from a slight unassuming child into a muscular young man who was often complimented for his physique, which helped to at least partially compensate for his low self-esteem. Finally, given that his muscular physique was crucial to his work as a both a bouncer in clubs as well as an exotic male dancer, his regular high-dose steroid use combined with his rigorous weight training were a necessary fact of his employment.

According to the accompanying evaluation and report written by Dr. Harrison Pope, a nationally and internationally recognized expert on the psychiatric effects of steroids, Mr. Sayoc was using high doses of anabolic steroids at the time he put together and mailed these packages. Dr. Pope opines that Mr. Sayoc's psychological state on the steroids, e.g., feeling "invincible," contributed to him becoming pathologically obsessed with what he perceived as the biases of the media and of political and celebrity individuals on the left, and failing to appreciate that his behavior was grossly abnormal. Dr. Pope further states that this is characteristic of the stereotypic psychological effects seen in individuals under the influence of large doses of steroids.

Prior to his mailing of the packages, Mr. Sayoc's life experiences were dominated by him feeling victimized by various betrayals and disappointments over the course of his life. According to him,


this started with his having been abandoned by his father when he was around 5 or 6 years old. Then he was sexually abused by a priest on an almost daily basis at a Catholic boarding school when he was around age 11. Then he was taken advantage of in a string of both romantic and business relationships, which led to him declaring bankruptcy and losing his house in 2008, followed by years on the road touring in an itinerant male dance troupe performing in Chippendale-type shows. From 2008 onward, he lived in the back of his van, using the showers in gyms he had memberships in to manage daily hygiene and cooking meals in the DJ booths of the Gentleman's clubs where he worked. Because of his intense shame regarding the fact that he was essentially homeless, he hid this fact from his family members, friends, and co-workers, showing them pictures of what he claimed was where he lived if someone asked (although a number of them ended up guessing correctly that he was living in his van).

Although Mr. Sayoc never had any interest whatsoever in politics during most of his life, he became enthralled and energized by Donald Trump's campaign message of standing up for the powerless "little guy" (like him) and experienced Trump's oft-repeated claims of having come back from near bankruptcy to triumph as a self-made billionaire as offering him hope for his own precarious future. Mr. Sayoc was moved to demonstrate his support for candidate Trump by purchasing \$100 worth of Trump stickers, donating \$300 to support the building of Trump's border wall and spending \$2000 to attend Trump's inauguration. He became increasingly obsessed with Trump, and, starting sometime in 2016, would send relatives, friends, and even casual acquaintances a barrage of group texts containing links to Fox News articles and pictures. According to his cousin Kim, whom he had not seen in years, "Without asking me, Cesar added my e-mail to his group. I would wake up in the morning-and there would be many texts on my phone that had been sent overnight. I would just delete them without reading them."

Mr. Sayoc continued applying pro-Trump and anti-Democratic stickers on his van. Passersby's negative verbal reactions to his visible support of Trump sometimes resulted in his van (which also doubled as his home) being vandalized, which only intensified his support of Trump and stoked his anger towards those whom he believed to be attacking Trump, encouraging him to put even more stickers on his van. With the 2018 Congressional elections approaching, which Fox's Sean Hannity deemed "to be the most important mid-term election in history," Mr. Sayoc became even more frenzied in his support of Trump and, fueled by his steroid abuse, became convinced that the attacks on Trump supporters and his van were being instigated by a wide range of prominent Democrats, like Clinton, Obama, and George Soros. Triggering his historical need to stand up against those whom he believed were attacking him, he decided to fight back, first by performing a series of "reverse wishes" which involved lighting special candles in his van that he purchased from his storefront spiritual guide, lashing out on social media, and then sending packages to various prominent Democrats in order to scare them into stopping their incitement of Antifa and other anti-Trump forces.

Please notify me if you have additional information about this matter that you wish for me to consider.

Very truly yours,

A handwritten signature in cursive script that reads "Michael B. First".

Michael B. First, M.D.

Diplomate, Psychiatry, American Board of Psychiatry & Neurology

Professor of Clinical Psychiatry, Columbia University College of Physicians and Surgeons

EXHIBIT D

CURRICULUM VITAE

Michael Bruce First

Birthdate: November 25, 1956

Birthplace: Philadelphia, PA

Citizenship: USA

Office Address:

1051 Riverside Drive – Unit 60

New York, NY 10032

646-774-7935

FAX: 646-774-7933

e-mail: mbf2@columbia.edu

Academic Training

Princeton University	BSE, Computer Science	1978
Univ. of Pittsburgh	MS, Computer Science	1983
Univ. of Pittsburgh	MD	1983

Traineeship

Internship - Medicine	Shadyside Hospital, Pittsburgh, PA	7/83-6/84
Residency - Psychiatry	Columbia-Presbyterian, New York, NY	7/84-6/87
Fellowship - Biometrics	NYS Psychiatric Institute	7/86-6/88

Board Qualification

4/89- Diplomate in Psychiatry of the American Board of Psychiatry and Neurology,
#31114

Professional Organizations and Societies

1979- American Medical Association
1985- American Psychiatric Association, Fellow
1990- American Medical Informatics Association
1993- American Psychopathological Association
1996- Association for Research in Personality Disorders
2006- American Academy of Psychiatry and the Law
2009- American College of Psychiatrists

Academic Positions:

7/88-6/90 Instructor in Clinical Psychiatry, Department of Psychiatry, Columbia University College of Physicians and Surgeons
7/90-6/98 Assistant Professor of Clinical Psychiatry, Department of Psychiatry, Columbia University College of Physicians and Surgeons
7/98-6/05 Associate Professor of Clinical Psychiatry, Department of Psychiatry, Columbia University College of Physicians and Surgeons
7/05- Professor of Clinical Psychiatry, Department of Psychiatry, Columbia University College of Physicians and Surgeons

Hospital Positions:

7/88-6/90 Assistant Psychiatrist, Presbyterian Hospital
7/90-6/98 Assistant Attending Psychiatrist, Presbyterian Hospital
7/98-6/05 Associate Attending Psychiatrist, Presbyterian Hospital
7/05- Attending Psychiatrist, Presbyterian Hospital

Editorial:

1997-2000 Editor, DSM-IV-TR
1997-2000 Co-chairperson, DSM-IV Text Revision Workgroup
1999-2004 Medical Editor, Quick Reference Guides for APA Practice Guideline Project
1999-2002 Senior Associate Editor, Psychiatry Second Edition, John Wiley and Sons
1990-1994 Editor, Text and Criteria, Diagnostic and Statistical Manual of Mental Disorder (DSM-IV), American Psychiatric Association
1992-1996 Editor, Diagnostic and Statistical Manual of Mental Disorders - Primary Care Version (DSM-IV-PC), American Psychiatric Association
1995-1997 Editor, Handbook of Psychiatric Measures, American Psychiatric Association
2005- Co-editor, APA's Handbook of Psychiatric Measures
2006- Co-editor, Psychiatry, Third Edition, John Wiley and Sons
2014- Co-editor, Psychiatry, Fourth Edition
2011- Associate Editor, Journal of Nervous and Mental Diseases
2013- Section Editor, Psychiatric Diagnosis, Current Psychiatry Reports
2017- Author, Merck Manual for Diagnosis and Therapy, Chapters on "Overview of Mental Health Care" and "Approach to the Patient with Mental Symptoms."
2019- Editor and co-chair, DSM-5 text revision

Journal Reviewer

1990- Reviewer, American Journal of Psychiatry

1987- Reviewer, Psychiatric Services
1991- Reviewer, Journal of Personality Disorders
1990- Reviewer, Archives of General Psychiatry/JAMA Psychiatry
1993- Reviewer, Journal of the American Medical Informatics Association
1993- Reviewer, Psychosomatics
1995- Reviewer, Journal of the American Medical Association
2001- Reviewer, Biological Psychiatry
2002- Reveiwer, Comprehensive Psychiatry
2003- Reviewer, Psychological Medicine
2004- Reviewer, Journal of Psychiatric Research

Forensic:

1998- Member, Forensic Panel, New York, NY

Court Testimony as Expert Witness:

United States of America vs. Dario Pimentel (02 Cr. 1517) US Southern District of New York. Testimony at Daubert hearing for United States of America.

United States of America v. Zacarias Moussaoui, a/k/a :”Shaquil”, a/k/a “Abu Khalid al Sahrawi.” (01 Cr 455). Testimony for Zacarias Mossaou during mitigation phase at trial, April 19. 2006

New York State v. Fentress,(425 N.Y.S.2d 485). Testimony for New York State re: hearing re: release from detention.

Hanlon vs. Abel/Noser. Deposition for plaintiffs . March 2006

Deposition In Re the Detention of William Davenport, aka William Cummings, Respondent. In the Superior Court of the State of Washington, in and for the County of Franklin, case no. 99-2-50349-2, December 16, 2007

Paul Dennis Reid, Sr. vs. State of Tennessee, Post-conviction No. 38887, Circuit Court, 19th Judicial District, Montgomery County, Tennessee, Division III. Testimony for Paul Dennis Reid, May 15, 2008. Presented evidence regarding competency to waive appeal process for defendant on death row for multiple murders.

United States of America vs. Abdullah Khadr, Ontario Superior Court of Justice, Court File Number EX0037/05, Testimony for United States of America, June 25, 2009. Presented evidence questioning whether purported PTSD diagnosis related to alleged torture in Pakistan jail could account for alleged false confession in terrorism case.

Doe v. Marriott International Connecticut 10896.00020. Deposition for defendant. March 8, 2010

Dixon vs. Kubiak et al, Deposition for defendant, September 30, 2010

Malajian vs. In Mocean, et. al., Deposition for defendant, August 3, 2011.

Cohn vs. Hayward et al. Deposition for plaintiff, September 7, 2011

Collins vs. State of New York et. al. 07-CV-0493 testimony for defendant in civil lawsuit March 19, 2012

United States of America vs. Mondher Bejaoui, 10 CR 553 (SHS). Testimony for defendant re: competence to stand trial, August 13-14, 2012

United States of America vs. Joseph Duncan III, . 07-CR-00023-EJL, Testimony for defendant re: assessment of religious delusions in competency hearing re: decision not to appeal, January 25, 2013

United States of America vs. Manssor Arbabsiar, 11-CR-897 (JFK). Testimony for defendant re: mental disorder history in sentencing hearing. May 8, 2013 and May 29, 2013

Ronald W. Lafferty vs. Steve Turley, Case No. 2:07-CV-322DB. Testimony at competency hearing for petitioner, re: competency to assist attorneys in habeas petition, October 24, 2013 and October 25, 2013.

In Re: The detention of Robert Lough, No 09-2-29232-9 SEA. In the Superior Court of the State of Washington Testimony at SVP commitment hearing for respondent, January 28, 2015.

People of the State of NY vs. Pedro Hernandez – Supreme Court New York County – Indictment 4863/2012, Testimony for defendant at trial, March 10, 11, and 13, 2015.

People of the State of NY vs. Pedro Hernandez – Supreme Court New York County – Indictment 4863/2012 (retrial), Testimony for defendant at trial, December 5, 6, 8, 9, 2016

Vargas vs. County of Hudson, Deposition for Plaintiff, May 31, 2017.

Sarnelle vs. The Stamford Health System, Deposition for Plaintiff, October 25, 2017.

Michael Micciolo v. Eduardo Kraychik, M.D. et al.; CGP - Philadelphia County, February Term 2015, No. 000332, testimony for Defendant at trial, December 6, 2017.

Arena vs. Riversource Life Insurance Co., Deposition for Defendant, June 15, 2018

Kristie Perry, et. al. , v. State of Connecticut, Deposition for Plaintiff, October 17, 2018

Consultative:

1986-1987 Consultant, DSM-III-R Mood and Personality Disorder Committees
1987 Clinical Consultant, New York State Office of Mental Health Alternative Reimbursement Methodologies Project
1989 Participant in ICD-10 Field Trial of Clinical Guidelines for Diagnosis
1989-1992 Consultant, Committee on Information Systems, American Psychiatric Association
1989-1995 Consultant, Chapter V, International Classification of Diseases - Tenth Edition (ICD-10)
1990 Consultant, Federal Bureau of Investigation Project on Classification of Violent Crime
1990 Consultant, National Digestive Diseases Advisory Board
1990- Consultant, Committee on Diagnosis and Assessment, American Psychiatric Association
1991- Consultant, Committees on Personality Disorders, Mood Disorders, Psychotic Disorders, Anxiety Disorders, World Health Organization, 1991.
1991-1995 Consultant, American Health Information Management Association
1992- Consultant, National Center for Health Statistics
1987- Principal Trainer, SCID, Office of Mental Health, New York State
1993- Principal Trainer, DSM-IV, Office of Mental Health, New York State.
1993 Member, Initial Review Group, NIMH B-Start Program
1995 Consultant, Depression Management Program, UCLA Department of Psychiatry
1995-1997 Consultant, Columbia-Cornell-Duke Practice Guideline Consortium
1999-2005 Chairperson, Subcommittee for Psychiatric Causes of Headache, for International Classification of Headache, published by International Headache Society
1999-2005 Member, Steering Committee to Revise International Classification of Headache
1999- 2002 Chair, GAPS in DSM-IV subcommittee for APA DSM-V Research Planning Project
2002-2007 Member, Editorial Board, Diagnostic Manual for the Dually Diagnosed, National Association for the Dually Diagnosed (Mental Disorders and Mental Retardation)
2004-2007 Director, DSM-V Prelude Web-Based Project
2006- 2009 Chair, American Psychiatric Association Committee on Psychiatric Diagnosis and Assessment
2006- Member, American Psychiatric Association, Council on Research

2009- Chief Technical and Editorial Consultant to WHO Secretariat, Revision of the Mental and Behavioral Disorders Chapter on the International Classification of Diseases
2010- External consultant to the National Institute of Mental Health Steering Committee on the Research Domain Criteria Project
2012-2013 Reviewer consultant. DSM-5
2012-2013 Editorial consultant, DSM-5
2013-2014 Member, American Psychiatric Association DSM Planning Committee
2014 – Member, American Psychiatric Association DSM Steering Committee

Honors and Awards:

Fellow, American Psychiatric Association
Castle Connolly Best Doctors in New York award (top 2.2% of peers) 2017, 2016, 2014, 2013, 2012, 2011, 2010, 2009, 2007, 2005 and 2006
Faculty member, Lundbeck International Neuroscience Foundation, 2004-present
NYSPI Alumni Association Research Award for best research by graduating resident, May 1987
L.W. Earley Memorial Prize, University of Pittsburgh School of Medicine, June 1983, award for highest honors in Psychiatry
Graduated Summa Cum Laude, Princeton University, 1978
Membership in Tau Beta Pi, Engineering Honorary Society, 1977-present
Membership in Eta Kappa Nu, Electrical Engineering Honorary Society, 1977-present.
Winner Westinghouse Science Talent Search, 1974

Fellowships and Grant Support

2003-2007
Co-principal investigator, Future of Psychiatric Diagnosis, APA-NIMH Cooperative agreement for 10 research planning conference for DSM-VI.ICD-11
2000-2004
Co-principal investigator, Services Needs in Early Psychosis and Drug Use Continuation, NIDA RO1-DA1053906, \$1,282,406 4/1/00 to 2/28/04
1997-2002
Co-principal investigator, Service Needs in Early Psychosis and Drug Use. NIDA R01-DA10539. 01A1, \$1,732,011 4/11/97 to 2/28/02.
1990-2007
Salary support paid to Columbia University Biometrics Research from American Psychiatric Association Office of Research for DSM-related projects: \$454,000 in salary, direct and indirect costs
1989-present
Principal Investigator: DTREE: DSM Diagnostic Expert System. Royalty Account #903-4019A, \$77,957.11 (ongoing accrual)

1990-93

Co-Principal Investigator: Focused Field Trials for DSM-IV. NIMH Program Project Grant SRCM-P (20) 3 P01 MH47200-01F2. Three years with \$2,023,590 in direct costs (A. Frances, PI)

1991-94

Co-investigator: MICA Project, St. Lukes-Roosevelt Hospital, Center for Substance Abuse Treatment, Grant #OT-90-2 (S. Zinberg, PI)

1985-87

Principal Investigator: PSYCH-AID: A microcomputer-based expert system for guiding diagnostic workups in Psychiatry, Basic Research Support Grant #903-E761S from Research Foundation for Mental Hygiene, Inc./New York State Psychiatric Institute, Two years, \$8000.00

Departmental and University Committees

1990- Member, NYSPI Institutional Review Board

Academic Teaching experience and responsibilities

2011- Lectures and Workshops on DSM-5 and related topics, at numerous locations in the United States and internationally

7/06- Co-teach Diagnostic Interviewing Course for PGY2 residents at New York Psychiatric Institute

7/01- Lecture on Personality Disorders for Second Year Medical Students – Columbia College of Physicians and Surgeons

7/00-6/01 Course on Personality Disorders for Third Year Medical Students – Columbia College of Physicians and Surgeons

7/88- Psychotherapy Supervisor (Schema-focused cognitive therapy for Personality Disorders); 2 residents per year (either 2 PGY3 residents or 1 PGY3 and 1 PGY4 elective supervision per year), Residency Program, New York State Psychiatric Institute

7/92- SCID Interviewing Course, PGY2 residents, New York State Psychiatric Institute (4-6 hours per year)

7/87-7/89 Preceptor, Columbia University School of Medicine Third year psychiatry course (15 students per year)

Publications

EXHIBIT E

July 5, 2019

Honorable Jed S. Rakoff
United States District Judge

Re: Mr. Cesar Sayoc

Your Honor:

My name is Kimberly Sayoc. I am a first cousin of Cesar Sayoc. Our fathers, who are both deceased, were two of nine siblings who were born and raised in the Philippines by our grandmother, Severina Zook Sayoc, a dentist, and our grandfather, Burgos Topacio Sayoc, a plastic surgeon and General in the Philippine Army during World War II.

I reside in a suburb of Buffalo, New York, with my husband of nearly 20 years, Michael Lorenzo. I have been an attorney in both private practice and in-house counsel positions for over 20 years. I am currently Special Counsel to one of the oldest and largest law firms in Buffalo, New York.

I do not remember the first time I met Cesar and his family, but I'm sure I have known them for most of my life. My parents, Dr. Oscar Sayoc, a plastic surgeon like our grandfather, and Florence Sayoc, a registered nurse, ended up in Buffalo after my father was drafted on a green card in the Viet Nam war. My mother and my brother, who was an infant at the time, moved to Korea and then to the Philippines to be close to where my father was stationed in the U.S. Army. After being honorably discharged from the U.S. Army, my parents came to Buffalo so that my father could pursue a fellowship in plastic surgery that he had deferred for four years while serving in the U.S. Army.

My parents bought a condominium in Southwest Florida in the early 1980s. That place became my family's vacation home and often when we traveled there, we would visit with Cesar, his mother, and sisters.

My parents always desired to remain close with family and welcomed any opportunity to be with family. In 1996, when I was in my second year of law school and still living at my parents' house, Cesar came to visit, as he was traveling through Western New York for work. My parents welcomed him and invited him to make their house his home base as he traveled around the region and had downtime between shows dancing with a male dance revue. This period of time, which was about three weeks to a month, was the most time I have spent with Cesar in my life. I observed him being very kind and respectful to my parents. He truly loved my parents and they enjoyed his company. Cesar was always upbeat and positive, had a great attitude and obviously loved my parents. I was grateful for the way he treated my parents. He was very thoughtful and offered to help with things around the house while he was there.

The next contact from Cesar that I recall following his visit in 1996 was a message he left on my parents' answering machine the night before my wedding in 1999. He said that he was calling to wish Michael and me the best on our wedding the following day.

My father passed away suddenly in December of 2014. It was such a shock and so much time had passed since I had had contact with Cesar's family, I didn't even think of notifying them. A few months later, Cesar called me in my office, having tracked me down on the Internet, and said that he heard my mother had passed away. I told him that my mother was actually still alive, although she is suffering from severe dementia, but that my father had passed away. Cesar's reaction at the death of my father was emotional and very appropriate for someone who had viewed him as a father figure. I felt very bad to have broken the news to him that way, as it was obviously a shock to him. During that conversation, Cesar asked if we could stay in touch going forward and said that he was possibly going to visit us and my mother if he had occasion to travel through Western New York.

From about May of 2015 until close to the time of his arrest, Cesar and I have communicated by text messaging and an occasional phone call. He often sent texts on holidays, including Mother's Day, Thanksgiving, and Christmas, wishing my mother and my family a happy holiday. I believe he sent similar messages to my brother and his family. Most of those texts ended with "Love you, cousin." Toward the 2016 election, I noticed that many of Cesar's texts were political in nature, but I didn't think of blocking them because he would also send the usual texts on holidays and updates on his whereabouts, and I appreciated his affection toward my mother and my family and the fact that I was in communication with someone who knew, loved, and respected my parents.

One of the last text message exchanges I had with Cesar was on October 5, 2018, just a few weeks, unbeknownst to me, before he would be implicated in this case. I had sent him a video of my mother that her sister had taken earlier that day in the nursing home just so that he could see her face. His reaction was so positive, even though my mother is so compromised. He said that we should embrace the fact that my mother is still physically here and that she and my father were always good to him and listened to him and provided guidance. He ended the text with "Love them always," referring to my parents.

That's the Cesar Sayoc that I know. He is loving toward his family. He has a great respect for his Grandfather Sayoc and my father, Oscar Sayoc, for serving their respective countries in the military and for instilling a work ethic in their children and grandchildren. I have always perceived Cesar as a caring and sensitive person based on his interactions with my parents. He is very kind and loving. In speaking to him recently, I believe that Cesar feels that he has truly made a terrible mistake, but that he never meant to hurt anyone. I believe he recognizes that he needs to change his life and that he is committed to doing so.

Very truly yours,
Kimberly W. Sayoc

EXHIBIT F

May 19, 2019

Honorable Judge Jed S. Rakoff

United States District Judge

Dear Judge Rakoff:

I am Cesar Sayoc's mother, Madeline Giardiello. I am 77 years old and currently work as a representative for beauty companies. I used to own my own cosmetic company until I sold it to a large corporation. I wanted you to know a little about his personal life growing up with our family.

For almost all of their lives, I was the sole provider for my three children, Cesar and his two sisters, Sabrina and Christina. When Cesar was 7 years old, his father and I got a divorce and he left us. I used to work two jobs, one of them being running the wholesale business I owned. Cesar's father, who is also named Cesar, was always traveling every 6 months to the Philippines. He told me he was setting up our wholesale business there so we wouldn't have to have a middle man. He said he was working on building us a warehouse. I was sending him money – whatever he needed – thinking he was putting up a warehouse. Eventually, his brother saw how hard I was working, all hours of the day, to hold down the fort for our three kids and he got tired of seeing me break my back for nothing. He admitted to me that Cesar's father was a womanizer who was on drugs and was using the hard-earned money I was sending him to gamble. There was no warehouse. I was so devastated, thinking that here I have 3 kids and a business. I realized I couldn't continue like that and I filed for divorce.

I had already filed for divorce by the time Cesar's father came back home. I told him he could not live with us anymore. He said that he wanted to talk to the kids before he left. He told Cesar he was going to come back one day and get him and take him to the Philippines with him. From that early age, Cesar had it in his head that his father would come back. But his father left and never came back. He never called, never sent us any money even though a judge ordered him to pay alimony, and never even sent a birthday card. No matter what we said to Cesar to try to help him see that his father wasn't come back, he rejected everything because he was in the frame of mind that his dad would come back for him.

After my divorce with Cesar, I met my current husband, John, who I've been married to for 43 years. John loves my three kids. He took on another family and he loved my kids completely and would do anything for them. John tried so hard with Cesar. But because Cesar felt like his father was coming back for him, he stayed distant from John. Maybe he didn't want to get attached again and be abandoned.

When Cesar was growing up, he was a really sweet kid, and would always try to help out where he could. After his dad left, Cesar started acting out at home, and he wasn't himself. I had to work full time, running the business. I had a nanny taking care of the children at that time. I believe at that point Cesar was very upset, and tried his best to cope with his father leaving but he couldn't quite get over it. Cesar stopped doing well in school, and started to keep more to himself, so we thought it would help him if we sent him to a boarding school in Bay St. Louis Mississippi called Saint Stanislaus. He went to Saint Stanislaus for about a year, but he was calling home every day begging to come home. I thought he just wasn't used to the environment, so I didn't bring him back at first. After that first year, I ended up

bringing him home because I felt sorry for him being alone. Little did we know at that time, that he was sexually abused by the priest there. Cesar never mentioned it to me or anyone else because he was ashamed and embarrassed. I didn't know anything about the abuse until about 4 and a half years ago when we were having an argument. He showed me the papers from his lawsuit against the school. My heart was so broken with this because had we known any of this, we would have pursued it with the school, and the law, even more than he did on his own.

Cesar was never the same after his time at the boarding school and always had that mental block. When he came home he was very distant, and he turned into an introvert. He would go to his room all the time. When we had family dinner, he would go and sit alone in his room even when we asked him to come out and sit with us. He stopped participating with us. He was not like that before in his younger years. Between his father leaving and the sexual abuse, I think this was the start of Cesar's problems. We tried to get help for him but he wouldn't go, saying he was okay and that he didn't need help. Eventually we just let it go. Maybe that was partly my fault, thinking that he would get over it on his own.

After coming back from the boarding school, Cesar lived with me until he was 18 or 19 years old. Then he went to live with my mother and father. He had an incredibly strong bond with them. He was their only grandson and he was my firstborn, so he could do nothing wrong in their eyes. Whenever I would say no to something, he would go to his grandparents and they would say yes. When they got older, he would do everything for them. He fed them, gave them things to drink, and washed them. There wasn't anything they wouldn't do for him and nothing he wouldn't do for them. He sometimes called them his mother and father because they were always around.

He stayed with my parents until he started abusing steroids. Then he became very verbally abusive to my mom and dad. He would come home at all kinds of hours, and they were elderly and wanted their sleep. At the time we didn't know he was on steroids. It wasn't until we started noticing how much he had bulked up and we started to get suspicious. I asked his friend, who admitted Cesar was taking them. And he was taking them for so long, I think they fried his brain. One time Cesar pushed my father and that was the last straw. I know Cesar didn't mean to do it because he would never do something like that normally but he was out of his mind. Eventually, my parents couldn't have Cesar in their home anymore so he moved out to live with a friend. After they passed away, Cesar was lost without them, completely devastated. They probably rolled over in their graves when all this happened.

Cesar has really made a very big mistake. He's got a lot of baggage, this poor kid. I know he's not a kid anymore, but he's still my kid. He never used to talk about politics, and I think he got led astray somehow. I think his brain really was fried by the steroids and he's just a really gullible person. Trump's rhetoric targets weak-minded people like my son into believing everything he's saying. Cesar is really a good person, and would help everyone and try to help the homeless and strangers. Even though he lived out of his van, if he saw a homeless person he would give them money. He has shown me such remorse over the phone, as he calls me every day and sometimes 3 times a day. He cries and tells me how sorry he is and that he doesn't know why he did it. He is hurting very bad and wants to change himself back to his good ways after this case is over.

I know Cesar has always been a worker. In high school he would get a job at a fruit juice bar after school, or play on the soccer team. He could never stand still, always working, always moving. Now that he has

all this time to himself driving himself crazy because he's not used to standing still. Cesar wants to get the help and do whatever needs to be done to get better in the future.

Thank you Your Honor for listening to me about my son. We love him and can't wait for him to come home so we can take care of him.

Best Personal regards,

Madeline Giardiello

Cesar's Mom

EXHIBIT G

June 25, 2019

Dear Honorable Judge Jed S. Rakoff

United States District Judge

My name is Christina Villasana (TINA), age 52, the youngest sister to Cesar Sayoc. My profession of 30 years has been in the educational field as a preschool/private school owner/operator alongside my husband for over 27 years.

My mother and father had three children, I the youngest, my sister then my oldest and only brother, Cesar. I always felt like our childhood was happy growing up. In many ways we were a typical family in a house of fun and laughter. My biological father left me and my siblings when I was only 2 years old, so Cesar was about 6. My mother, single, working and taking care of three small children still provided the best for us. Our grandparents (her parents) moved from New York to help her. My grandparents, who passed away many years ago, were our rocks.

My mother remarried and my dad today, John, raised me from the age of 2. My parents were always attending to us. We had a very normal childhood. Cesar loved soccer and he was great at it. He would eat, breathe and live soccer as a child until high school, and even went to college for it, for a little while. I know we had to call him in for dinner each and every night, call him off the field; we lived right across the street from our high school football field we attended, which was convenient.

But somewhere along the line of our life, I saw my brother become introverted in a way, now that I look back. He became very withdrawn. We would do things as a family but I think somewhere in the back of his mind he thought his dad would come back for him. He never had a fabulous relationship with John. I think his walls were up. Cesar then developed some behavior issues and struggled with academics. The waiting for our biological father and the longing for attention mixed with him not doing well in school caused him to act out. He was always fighting with my mom and John. My grandparents helped our mom take care of us but in their eyes he could do no wrong. It was then my mother sent him away to all boys Catholic school.

It wasn't until he was arrested in this case that I learned what happened to him at the boarding school. I think he didn't tell me out of embarrassment. I'm not sure he even knows I know now. I know it came out during a fight with our mother that he was sexually assaulted by a priest in the school. That really hurts my heart as no one knew this. Maybe that's why he had all that anger towards her when he was younger.

Cesar, as he got older, loved to work out and really stuck to that most consistently of anything he took on. He was an extremely hard worker. He knew the structure of going to work and collecting a paycheck after many attempts on failing businesses. I felt sorry for him because of his IQ level, but Cesar always wanted to function as a normal person. I always felt very sorry for him because there is something more to his thinking and mind that I know is not 100%.

My brother struggled always as a young boy and adult, and I would analyze this for the years he came in and out of our lives. He was a loner, and absolutely not a political person. I hate to say this but his intelligence level was quite low. I saw that no matter his age his mind functioned as a 17 year old, always young minded in his thinking and goals. He was a fantasy land talker with no real friends.

It was about 4 years ago that he became estranged completely and lost touch. Cesar would go through periods of coming around on occasions only; he always came in and out of our life.

When we got older and we didn't keep in close touch, we'd talk every once in a while and see each other for holidays. I knew he was working hard for his money and he was always out on the road. I knew he was into steroids because he went through an intense body building phase also while working as a dancer and bouncer at bars. I didn't see him regularly enough to notice the effect the steroids were having on him. He was always unrealistic, always dreaming, fantasizing, but he never talked politics with me or the family. I don't think he even knew who the president was at any point over the last 20 years.

When this case became public I was in the hospital with my mother who had just had surgery for her prolapsed bladder. When his face flashed across the screen I fell to the ground. I couldn't even believe it. I never noticed him getting more political. I think he and a friend went to a Trump rally but that's all I knew. I didn't believe this could be real. I have no idea how he got into politics. All I can think of is it could've been the drugs over time doing something to his mind. This is not the Cesar I know. I still can't wrap my mind around what he's done.

I can truly go on about my older brother Cesar, but I hope this sums up a lot about him as a great human being, from when he was little to now. I think his childhood along the way, especially the incident with the church school he attended, could have been the start of things. The use of steroids long term and feelings of abandonment probably contributed too. I am truly upset to learn of this now while all this is going on in his life. But no matter what, Cesar, my beloved brother, I know could not even hurt a fly. That is the truth. He is sweet, gentle and kind, a lost teddy bear. I hope he gets all of the help he needs so he can come home and be part of the family again.

Thank you Honorable Judge Jed S. Rakoff

May we all be Blessed and Have a Wonderful Day!!!

Christina M. Villasana

Youngest Sister

EXHIBIT H

ERIC F. CILIBERTI, M.D., P.A.
PRACTICE LIMITED TO NEURO-OPHTHALMOLOGY

July 4, 2019

1050 N. FEDERAL HWY
HOLLYWOOD FL 33020
(954) 458-2112
FAX (954) 456-7186

Honorable Judge Jed S. Rakoff
United States District Court

Dear Honorable Judge Rakoff:

8051 W. SUNRISE BLVD.
PLANTATION FL 33322
(954) 474-2900
FAX (954) 474-2901

Re: My relationship with the Family of Caesar Sayoc and with Caesar Sayoc for
your review and consideration

My name is Dr. Eric F. Ciliberti and I am a Neuro-ophthalmologist practicing in
six locations throughout the South Florida area. I am also a retired Captain in the
U.S. Air Force Reserve.

6233 N. UNIVERSITY DR.
TAMARAC FL 33321
(954) 721-0000
FAX (954) 721-6308

120 W. PALMETTO PARK
RD.
BOCA RATON FL 33432
(561) 395-7616
FAX (561) 395-1399

16244 S. MILITARY TR.
SUITE 690
DELRAY BEACH FL 33484
(561) 495-2811
FAX (561) 495-9538

901 N. CONGRESS
AVENUE SUITE 104
BOYNTON BEACH FL
33426
(561) 732-8005
FAX (561) 732-0150

I have known Mr. Sayoc since we shared a crib together as infants. We are the
same age, and I played with him throughout our childhood. I have pictures of Mr.
Sayoc and myself accompanied by my parents in a park in NY. We must be 3-4
years old in the photos. His grandparents, Sal and Viola Alteiri were the
grandparents that I never had. My parents and I would visit his grandparents'
home each Sunday for dinner and I would be able to maintain this childhood
relationship. When Mr. Sayoc's parents moved to North Miami Beach Florida in
the early 1970's, my family followed suit a year later, and moved to North Miami.
We would often drive the short distance to their home and I would play with Cesar,
his sisters and his cousin Frank. His mother Madeline would cook all of us dinner.
I remember when his father disappeared and was told by my parents that he had
left and would never return. I was saddened myself by this news and I could see
that his father's disappearance had had a dramatic effect on Mr. Sayoc's
personality and behavior. Without his strict father's presence, he became
somewhat mischievous, even in the games we played. Nevertheless, I enjoyed his
company since he was like a cousin to me. I continued to remain in touch with
him until I left for my pre-med education at Emory University in Atlanta. When he
moved into his grandparent's home in the 1980's, we had the opportunity to meet
on several occasions, since my mother and I would often get together with the
Altieri's, now business partners with my mother. I have always sensed that despite
his occasionally wild behavior, that he was a good person. While without a father
the majority of his life, his grandfather Sal Altieri was the strict father he missed.
Unfortunately, his grandparents were old and as their health declined, they could
not cope with the burden of a young person in their small apartment. He was then
forced to live on his own. For the next decade or so, I had the occasion to meet with
him one or twice, typically at a funeral for one of his family members. He was
always an outgoing and friendly person. He never expressed any anger or ill will.

However, I could sense that he never recovered from the loss of his father. I last saw him about 5-10 years ago. He seemed to be searching for a purpose in life, never having been giving any direction in life or goals to achieve.

I was at first shocked, then saddened to see his face on the news, and to discover he was responsible for sending the packages. I believe his sad financial situation led to depression and he appeared to have finally found a sense of misdirected fulfillment (in President Trump); in whom to place all his support; perhaps in an odd way to compensate for the lack of a loving father.

While I believe that Mr. Sayoc's behavior does warrant some form of punishment, I would like for you to consider his inadequate upbringing and the abandonment by his father. He is from a part Italian heritage where family means a great deal, and he could see the close family relationship that his other relatives shared, and that he lacked. I believe he resented the fact that his father left him for another family.

While I understand that there will be great pressure for him to receive a maximum sentence, please understand that Mr. Sayoc is not a person who meant to harm anyone. I believe his actions were in part the same, but a more extreme form of the mischievous behavior that he was allowed to exhibit beginning in his teens. Perhaps he hoped to receive the attention he lacked.

Mr. Sayoc immediately accepted his guilt by pleading guilty, which appears to me to be atypical among other individuals guilty of similar crimes. I believe that he has not had any significant criminal past. I am certain that Mr. Sayoc would never be a further risk or burden to society upon his release. He has a very caring mother and two loving sisters, as well as several nieces and nephews who would be there to support him. I would also be there as a close friend.

Sincerely Yours,

Eric F. Ciliberti, M.D., M.S.

EXHIBIT I

November 27, 2013

PRIVILEGED – FOR SETTLEMENT PURPOSES ONLY

Via Email bfranco@koponairdo.com

Brent Franco, Esq.
Kopon Airdo
233 South Wacker Drive, Suite 4450
Chicago, IL 60606

RE: *Cesar Sayoc v. St. Stanislaus Boarding School & The Brothers of The Sacred Heart*

Dear Mr. Franco:

We respond to the request for documents and information in your letter dated November 21, 2013 as follows:

1. Attached are relevant pages from the 1974 St. Stanislaus Yearbook with pictures of Cesar, as well as Brother Raymond and Brother Hugh. Cesar reported Brother Raymond's abuse to Brother Hugh, who scolded Cesar while dismissing and disregarding his report. Also shown in the Yearbook is another student, Philip Machado. Cesar confided to Philip about the abuse by Brother Raymond, but Philip laughed at him.
2. Attached please find a chart of Cesar's last ten years of employment.
3. After St. Stanislaus, Cesar attended Miami Country Day School, North Miami, FL (7th grade), John F. Kennedy Middle School, North Miami Beach, FL (8th grade), and North Miami Beach Sr. High School, North Miami Beach, FL, where he received his high school diploma. Cesar attended college at University of North Carolina, Charlotte, and Brevard College, Brevard, NC but did not earn a degree as a young man principally because of his difficulty in coping with the sexual abuse he suffered. He has also took courses at Miami-Dade College and Broward College. He completed 3 years of course work toward a degree and presently intends to finish a B.A. degree at Brevard College.
4. Cesar does not have any significant medical history, and has never sought evaluation, therapy, counseling or medication for the abuse he suffered at St. Stanislaus Boarding School. Not unlike many victims of childhood sexual abuse, Cesar has had great difficulty talking about or confronting the abuse, particularly since he was demeaned and ignored when he contemporaneously tried to report the abuse at St. Stanislaus. Cesar's coping approach has been to rely upon self-help tapes from Anthony Robbins and Donald Trump, which he listens to obsessively.

5. Cesar has never written content in any form relating to the childhood sexual abuse he suffered, in a diary or otherwise.
6. Cesar's damages are in the form of non-economic damages reflected primarily in sleeplessness, intrusive thoughts, lack of trust, avoidance of showing emotion, and low self-esteem caused by the abuse. He has not to date been evaluated by a forensic psychologist.
7. Cesar reports that he has had no personal injury, material illness or extraordinary traumatic event that would affect his psychological and emotional state other than the sexual assaults by Brother Raymond.

Please contact me at your earliest opportunity with regard to scheduling an interview with Cesar. As we discussed, this interview may be transcribed but it shall be confidential, for settlement purposes and may not be used against him as evidence or for impeachment. It is important that we complete this pre-suit process as soon as possible so we can proceed forward one way or the other.

Very truly yours,



Stuart S. Mermelstein

SSM/mmc
Enclosure

EXHIBIT J

TRANSCRIPTS TO	DATE	EXTRACURRICULAR ACTIVITIES AND HONORS	DATE
Transcript of Scores	12/18/79		
Transcript of Scores	12/18/79		
Transcript of Scores	12/18/79		
Transcript of Scores	12/18/79		
Transcript of Scores	12/18/79		
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Transcript of Scores	12/18/79		
Transcript of Scores	12/18/79		

COMMENTS

Please date and sign each comment made

Comments	Date	Signature
1-7541 JAN/77 GRD=9 STAN. ACH. TASK I FORM A SAYOC, CESAR A.		
ID-NO 2659566 READING RS S S PERC STA9 GR/SEC 05-00 MATH COMP 25 152 11 3 BIRTH 62-03		
1-7541 JAN/78 GRD=10 STAN. ACH. TASK I FORM B SAYOC, CESAR A.		
ID-NO 2659566 READING RS S S PERC STA9 GR/SEC 10-00 MATH COMP 42 205 64 6 BIRTH 62-03		
1-7541 JAN/79 GRD=11 STAN. ACH. TASK II FORM A SAYOC, CESAR A.		
ID-NO 2659566 READING RS S S PERC STA9 GR/SEC 11-00 MATH COMP 25 197 44 5 BIRTH 62-03		

TEST DATE	TEST TYPE	TEST SCORE	TEST DATE	TEST TYPE	TEST SCORE
10/08/79	CD C	10/08/79	11/14/79	CD C	11/14/79
10/08/79	CD C	10/08/79	11/14/79	CD C	11/14/79
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SCHOOL:
STREET:
CITY:

This high school is accredited by the Southern Association of Colleges and Schools. Rank in class is determined by a total grade point average after the addition of bonus points for advanced sequences in science, math, and foreign language with an additional point for each class classified as an "Honors" Section.

Dade County Public Schools

SCHOOL - 75-41
DET P-2298

BY: []
DATE: []

RECEIVED []

RECEIVED []

00209546 GRADE 11, 1975-76
DET P-2298

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PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	11:30 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PM	11:30 AM 10:51 PM	11:30 AM 10:51 PM	1
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11/15/73
10-000007042
SAC-11 PR-538



CSAR A. SAVOC
NORTH MIAMI BEACH SENIOR HIGH

QUIN PROFILES REPORT
SEPT. 29, 1973 - AUG. 31, 1974

SCHOOL: 7541
ACT: 8-1366

000007042 GRADE-11 SECT-538
SAYNC CSAR A

COURSE	SUBJECT	AREA AND QUIN DESCRIPTION	GRADE	EFF. DATE	CON. DAYS	YEAR	QUIN	UNIT	PERIOD	TEACHER
01	1024-01	000000	C	02	76-01	01	76-01	1.00	03	MORRIS C
02	1024-01	000000	C	01	76-02	02	76-02	1.00	04	MORRIS C
03	1024-01	000000	C	09	76-03	03	76-03	1.00	05	MORRIS C
04	1024-01	000000	C	11	76-04	04	76-04	1.00	06	MORRIS C
05	1024-01	000000	C	01	77-01	01	77-01	1.00	07	MORRIS C
06	1024-01	000000	C	02	77-02	02	77-02	1.00	08	MORRIS C
07	101-01	004436	C	03	77-03	03	77-03	1.00	09	MORRIS C
08	101-01	004436	C	04	77-04	04	77-04	1.00	10	MORRIS C
09	101-01	004436	C	05	77-05	05	77-05	1.00	11	MORRIS C
10	101-01	004436	C	06	77-06	06	77-06	1.00	12	MORRIS C
11	101-01	004436	C	07	77-07	07	77-07	1.00	13	MORRIS C
12	101-01	004436	C	08	77-08	08	77-08	1.00	14	MORRIS C
13	101-01	004436	C	09	77-09	09	77-09	1.00	15	MORRIS C
14	101-01	004436	C	10	77-10	10	77-10	1.00	16	MORRIS C
15	101-01	004436	C	11	77-11	11	77-11	1.00	17	MORRIS C
16	101-01	004436	C	12	77-12	12	77-12	1.00	18	MORRIS C
17	101-01	004436	C	13	77-13	13	77-13	1.00	19	MORRIS C
18	101-01	004436	C	14	77-14	14	77-14	1.00	20	MORRIS C
19	101-01	004436	C	15	77-15	15	77-15	1.00	21	MORRIS C
20	101-01	004436	C	16	77-16	16	77-16	1.00	22	MORRIS C
21	101-01	004436	C	17	77-17	17	77-17	1.00	23	MORRIS C
22	101-01	004436	C	18	77-18	18	77-18	1.00	24	MORRIS C
23	101-01	004436	C	19	77-19	19	77-19	1.00	25	MORRIS C
24	101-01	004436	C	20	77-20	20	77-20	1.00	26	MORRIS C
25	101-01	004436	C	21	77-21	21	77-21	1.00	27	MORRIS C
26	101-01	004436	C	22	77-22	22	77-22	1.00	28	MORRIS C
27	101-01	004436	C	23	77-23	23	77-23	1.00	29	MORRIS C
28	101-01	004436	C	24	77-24	24	77-24	1.00	30	MORRIS C
29	101-01	004436	C	25	77-25	25	77-25	1.00	31	MORRIS C
30	101-01	004436	C	26	77-26	26	77-26	1.00	32	MORRIS C
31	101-01	004436	C	27	77-27	27	77-27	1.00	33	MORRIS C
32	101-01	004436	C	28	77-28	28	77-28	1.00	34	MORRIS C
33	101-01	004436	C	29	77-29	29	77-29	1.00	35	MORRIS C
34	101-01	004436	C	30	77-30	30	77-30	1.00	36	MORRIS C
35	101-01	004436	C	31	77-31	31	77-31	1.00	37	MORRIS C
36	101-01	004436	C	32	77-32	32	77-32	1.00	38	MORRIS C
37	101-01	004436	C	33	77-33	33	77-33	1.00	39	MORRIS C
38	101-01	004436	C	34	77-34	34	77-34	1.00	40	MORRIS C
39	101-01	004436	C	35	77-35	35	77-35	1.00	41	MORRIS C
40	101-01	004436	C	36	77-36	36	77-36	1.00	42	MORRIS C
41	101-01	004436	C	37	77-37	37	77-37	1.00	43	MORRIS C
42	101-01	004436	C	38	77-38	38	77-38	1.00	44	MORRIS C
43	101-01	004436	C	39	77-39	39	77-39	1.00	45	MORRIS C
44	101-01	004436	C	40	77-40	40	77-40	1.00	46	MORRIS C
45	101-01	004436	C	41	77-41	41	77-41	1.00	47	MORRIS C
46	101-01	004436	C	42	77-42	42	77-42	1.00	48	MORRIS C
47	101-01	004436	C	43	77-43	43	77-43	1.00	49	MORRIS C
48	101-01	004436	C	44	77-44	44	77-44	1.00	50	MORRIS C
49	101-01	004436	C	45	77-45	45	77-45	1.00	51	MORRIS C
50	101-01	004436	C	46	77-46	46	77-46	1.00	52	MORRIS C
51	101-01	004436	C	47	77-47	47	77-47	1.00	53	MORRIS C
52	101-01	004436	C	48	77-48	48	77-48	1.00	54	MORRIS C
53	101-01	004436	C	49	77-49	49	77-49	1.00	55	MORRIS C
54	101-01	004436	C	50	77-50	50	77-50	1.00	56	MORRIS C
55	101-01	004436	C	51	77-51	51	77-51	1.00	57	MORRIS C
56	101-01	004436	C	52	77-52	52	77-52	1.00	58	MORRIS C
57	101-01	004436	C	53	77-53	53	77-53	1.00	59	MORRIS C
58	101-01	004436	C	54	77-54	54	77-54	1.00	60	MORRIS C
59	101-01	004436	C	55	77-55	55	77-55	1.00	61	MORRIS C
60	101-01	004436	C	56	77-56	56	77-56	1.00	62	MORRIS C
61	101-01	004436	C	57	77-57	57	77-57	1.00	63	MORRIS C
62	101-01	004436	C	58	77-58	58	77-58	1.00	64	MORRIS C
63	101-01	004436	C	59	77-59	59	77-59	1.00	65	MORRIS C
64	101-01	004436	C	60	77-60	60	77-60	1.00	66	MORRIS C
65	101-01	004436	C	61	77-61	61	77-61	1.00	67	MORRIS C
66	101-01	004436	C	62	77-62	62	77-62	1.00	68	MORRIS C
67	101-01	004436	C	63	77-63	63	77-63	1.00	69	MORRIS C
68	101-01	004436	C	64	77-64	64	77-64	1.00	70	MORRIS C
69	101-01	004436	C	65	77-65	65	77-65	1.00	71	MORRIS C
70	101-01	004436	C	66	77-66	66	77-66	1.00	72	MORRIS C
71	101-01	004436	C	67	77-67	67	77-67	1.00	73	MORRIS C
72	101-01	004436	C	68	77-68	68	77-68	1.00	74	MORRIS C
73	101-01	004436	C	69	77-69	69	77-69	1.00	75	MORRIS C
74	101-01	004436	C	70	77-70	70	77-70	1.00	76	MORRIS C
75	101-01	004436	C	71	77-71	71	77-71	1.00	77	MORRIS C
76	101-01	004436	C	72	77-72	72	77-72	1.00	78	MORRIS C
77	101-01	004436	C	73	77-73	73	77-73	1.00	79	MORRIS C
78	101-01	004436	C	74	77-74	74	77-74	1.00	80	MORRIS C
79	101-01	004436	C	75	77-75	75	77-75	1.00	81	MORRIS C
80	101-01	004436	C	76	77-76	76	77-76	1.00	82	MORRIS C
81	101-01	004436	C	77	77-77	77	77-77	1.00	83	MORRIS C
82	101-01	004436	C	78	77-78	78	77-78	1.00	84	MORRIS C
83	101-01	004436	C	79	77-79	79	77-79	1.00	85	MORRIS C
84	101-01	004436	C	80	77-80	80	77-80	1.00	86	MORRIS C
85	101-01	004436	C	81	77-81	81	77-81	1.00	87	MORRIS C
86	101-01	004436	C	82	77-82	82	77-82	1.00	88	MORRIS C
87	101-01	004436	C	83	77-83	83	77-83	1.00	89	MORRIS C
88	101-01	004436	C	84	77-84	84	77-84	1.00	90	MORRIS C
89	101-01	004436	C	85	77-85	85	77-85	1.00	91	MORRIS C
90	101-01	004436	C	86	77-86	86	77-86	1.00	92	MORRIS C
91	101-01	004436	C	87	77-87	87	77-87	1.00	93	MORRIS C
92	101-01	004436	C	88	77-88	88	77-88	1.00	94	MORRIS C
93	101-01	004436	C	89	77-89	89	77-89	1.00	95	MORRIS C
94	101-01	004436	C	90	77-90	90	77-90	1.00	96	MORRIS C
95	101-01	004436	C	91	77-91	91	77-91	1.00	97	MORRIS C
96	101-01	004436	C	92	77-92	92	77-92	1.00	98	MORRIS C
97	101-01	004436	C	93	77-93	93	77-93	1.00	99	MORRIS C
98	101-01	004436	C	94	77-94	94	77-94	1.00	100	MORRIS C
99	101-01	004436	C	95	77-95	95	77-95	1.00	101	MORRIS C
100	101-01	004436	C	96	77-96	96	77-96	1.00	102	MORRIS C
101	101-01	004436	C	97	77-97	97	77-97	1.00	103	MORRIS C
102	101-01	004436	C	98	77-98	98	77-98	1.00	104	MORRIS C
103	101-01	004436	C	99	77-99	99	77-99	1.00	105	MORRIS C
104	101-01	004436	C	100	77-100	100	77-100	1.00	106	MORRIS C
105	101-01	004436	C	101	77-101	101	77-101	1.00	107	MORRIS C
106	101-01	004436	C	102	77-102	102	77-102	1.00	108	MORRIS C
107	101-01	004436	C	103	77-103	103	77-103	1.00	109	MORRIS C
108	101-01	004436	C	104	77-104	104	77-104	1.00	110	MORRIS C
109	101-01	004436	C	105	77-105	105	77-105	1.00	111	MORRIS C
110	101-01	004436	C	106	77-106	106	77-106	1.00	112	MORRIS C
111	101-01	004436	C	107	77-107	107	77-107	1.00	113	MORRIS C
112	101-01	004436	C	108	77-108	108	77-108	1.00	114	MORRIS C
113	101-01	004436	C	109	77-109	109	77-109	1.00	115	MORRIS C
114	101-01	004436	C	110	77-110	110	77-110	1.00	116	MORRIS C
115	101-01	004436	C	111	77-111	111	77-111	1.00	117	MORRIS C
116	101-01	004436	C	112	77-112	112	77-112	1.00	118	MORRIS C
117	101-01	004436	C	113	77-113	113	77-113	1.00	119	MORRIS C
118	101-01	004436	C	114	77-114	114	77-114	1.00	120	MORRIS C
119	101-01	004436	C	115	77-115	115	77-115	1.00	121	MORRIS C
120	101-01									

07/07/80
 IL-002659566
 CR-12 HR-645
 CYCLE-791

DADE COUNTY PUBLIC SCHOOLS

CEGAR A. SAYOC
 BIRTH DATE: 03/17/62

NORTH MIAMI BEACH SENIOR

COURSE
 SEC-SEC

SUBJECT
 CODE

SUBJECT AREA
 COURSE DESCRIPTION

224 225 226 227 228 229 230
 ACAD EF-COM AD-TAN COM-COM-PRG- INSTRUCTOR
 GRADE PORT DUCT SENT DIES MENT MENT DO NUM NAME

01	F08-01	866002	***** DCT: EMPLOYABILITY SKILLS	A	1	A	07	01	645 RUBENSTEIN G
02	A12-10	511601	***** LANGUAGE ARTS REQUIRED REGULAR	D	2	A	04	03	613 PICKARD C
03	M05-01	229304	***** MATHEMATICS INDEPENDENT STUDY A	C	2	A	06 00	03	217 DOSTIL H
04	L01-13	041605	***** SOCIAL STUDIES AMERICAN HISTORY I (SENIOR HIGH)	D	2	A	07	04	344 HAYES E
05	F17-01	860101	***** DCT: ON-THE-JOB TRAINING-I	A	1	A	07	05	645 RUBENSTEIN G

EXPLANATION OF GRADING SYMBOLS

----- ACADEMIC -----
 A-EXCELLENT
 B-GOOD
 C-SATISFACTORY
 D-IMPROVEMENT NEEDED OR UNSATISFACTORY REMEDIAL
 F-UNSATISFACTORY
 NC-NO GRADE
 SR-SATISFACTORY
 I-INCOMPLETE

----- EFFORT -----
 1-OUTSTANDING
 2-SATISFACTORY
 3-INSUFFICIENT

----- CONDUCT -----
 A-EXCELLENT
 B-GOOD
 C-SATISFACTORY
 D-IMPROVEMENT NEEDED
 F-UNSATISFACTORY

SCHOOL- 1541
 DCT A-2013

REVISION

REVISION

002659566 GRADE-12 SECT-445
 SAYOC CESMA A

08/11/79
10-02659566
CR-12 HR-445
CYCL-791

STUDENT SCHEDULE
AUG. 27, 1979 - JUN. 23, 1980

CESAR A. SANCHEZ
BIRTH DATE: 03/11/42

NORTH BRANCH SENIOR

COURSE SEC-SEC	SUBJECT CODE	SUBJECT AREA COURSE DESCRIPTION	SEC PER	END PER	ROOM	DAYS INST NET	INSTRUCTOR NAME
01	FLI-01	066001 DIVERSIFIED EDUCATION EMPLOYABILITY SKILLS FOR VOCATIONAL STUDENTS	01	0104	445	NTMF	RUBENSTEIN M
02	604-04	221301 MATHEMATICS INTERMEDIATE GEOMETRY A	02	0248	542	NTMF	PAGE M
03	A12-10	511601 LANGUAGE ARTS ENGLISH 4, REQUIRED REGULAR	03	0221	613	NTMF	PICKARD C
04	L01-08	041605 SOCIAL STUDIES AMERICAN HISTORY 1 (SENIOR HIGH)	04	0250	244	NTMF	FITZGERALD M
05	FLI-01	066001 DIVERSIFIED EDUCATION DCT: CM-1HE-08 TRAINING-1	05	06	0FLD	445	RUBENSTEIN M

SCHOOL- 7541
DCT C-2119

002659566 GRADE-12 SECT-445
SAYOC CESAR